

St. Johns County

Community Development Block Grant — Disaster Recovery

General Policies and Procedures

Revised April 11, 2022



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OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) allocated Community Development Block Grant Disaster Recovery (CDBG-DR) funds to the State of Florida Department of Economic Opportunity (DEO). This funding is being distributed in federally-declared disaster counties impacted by Hurricane Matthew including St. Johns County for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 United States Code (U.S.C) 5301 et seq.) and described in the State of Florida CDBG-DR Action Plan. DEO has provided \$89,632,120 in CDBG-DR funding to St. Johns County to implement programs in support of the County's recovery from Hurricane Matthew. Allocations, waivers, and alternative requirements applicable to this funding are published in the Federal Register on August 7, 2017 at 82 FR 38812; January 18, 2017 at 82 FR 5591; and November

Revision History:

St. John County CDBG-DR General Policies and Procedures

Version	Date	Page	Description
#1	March 28, 2022	Various	Updated complaint process and add PII
#2	April 11, 2022	10, 29	Updated Program Income, added Travel
#3			

Program Description

St. Johns County will use CDBG-DR funds to principally benefit low- and moderate-income persons in a manner that ensures that at least 70 percent of the grant amount awarded under this Agreement is expended for activities that benefit such persons. Funds will be used for economic revitalization and infrastructure activities, and identify how any remaining unmet housing needs will be addressed or how its economic revitalization and infrastructure activities will contribute to the long-term recovery and restoration of housing in the most impacted and distressed areas.

St. Johns County will conduct all program design and implementation services necessary to mobilize and launch its production implementation systems to support programs and projects to help people, properties and communities recover from storm related damage due to Hurricanes Hermine and/ or Matthew. St. Johns County will offer a range of services including, a Housing Program, Affordable Housing Program and Infrastructure Program.

General Program Guidelines

General

In this general section of these policies and procedure are an overview of the program and specific sections. The individual subsections to this “General Program Guidelines” provide greater detail and supersede this section for guidance.

Program Administration

The administrating agency for the Community Development Block Grant-Disaster Recovery is the Department of Economic Opportunity. The implementing agency is St. Johns County.

Implementation and design

Assistance from the Administrative Management Consultant has been provided as requested; including but not limited to, providing case management staff for the intake center. As of January 2021 all case management and project management has been provided by SJC County staff.

Program Requirements

All activities must meet one of the three National Objectives required under the authorizing statute of the CDBG program. The national objective for each activity is approved by DEO prior to implementation. SJC certifies that the activities carried out under the CDBG-DR Agreement shall meet the following national objectives and satisfy the following criteria:

- Benefit Low to Moderate Income (LMI) persons;
- Aid in the prevention or elimination of slums or blight (Slum and Blight); and
- Meet a need having a particular urgency (Urgent Need).

Policies and Procedures

Each of the three Program Areas (Housing, Affordable Housing, and Infrastructure) will have an overarching Policy and Procedure Manual. As needed, each Program Area will develop appropriate supplemental Policies and Procedures specific to that Program area. Policy and Procedures will be update periodically throughout the life cycle of the grant.

Any updates made to a Policy and Procedure Manual will be reviewed and approved by the Grant Administrator.

Personally Identifiable Information

It is the policy of the CDBG-DR Program to protect personally identifiable information (PII) of employees, contractors, vendors and clients. The electronic restrictions and safeguards outlined in this policy provide guidance for employees, service members, contractors, vendors and clients that have access to PII retained by the CDBG-DR Program to ensure compliance with state and federal regulations.

Definitions

1. Personally Identifiable Information (PII) is any information pertaining to an individual that can be used to distinguish or trace a person's identity. Some information that is considered PII is available in public sources such as telephone books, public websites, etc. This type of information is considered to be Public PII and includes:
2. First and Last name
3. Address
4. Work telephone number
5. Work e-mail address
6. Home telephone number
7. General educational credentials
8. Photos and video

In contrast, Protected PII is defined as any one or more of types of information including, but not limited to:

1. Social security number
2. Username and password
3. Passport number
4. Credit card number
5. Clearances
6. Banking information
7. Biometrics
8. Data and place of birth
9. Mother's maiden name
10. Criminal, medical and financial records
11. Educational transcripts
12. Photos and video including any of the above

Procedures

This section provides guidelines on how to maintain and discard PII. All electronic files that contain Protected PII will reside within a protected information system location. All physical files that contain Protected PII will reside within a locked file cabinet or room when not being actively viewed or modified. Protected PII is not to be downloaded to personal or organization owned employee, service member, volunteer, or contractor workstations or mobile devices (such as laptops, personal digital assistants, mobile phones, tablets or removable media). PII will also not be sent through any form of insecure electronic communication (e.g. Online Form, E-mail or instant messaging systems). Significant security risks emerge when PII is transferred from a secure location to a less secure location or is disposed of improperly. When disposing of PII the physical or electronic file should be shredded or securely deleted.

Incident Reporting

The Grant Administrator must be informed of a real or suspected disclosure of Protected PII data within 24 hours after discovery (e.g. Misplacing a paper report, loss of a laptop, mobile device, or removable media containing PII, accidental email of PII, possible virus, or malware infection or a computer containing PII).

Training

The Grant Administrator will conduct PII Training for all Grant staff annually during April of each year. The Grant Administrator will maintain a signed PII Acknowledge Form from each of the Grant staff members.

Duplication of Benefits

All applications and projects will be initially reviewed for Duplication of Benefits (DOB) by St. John's County. The Department of Economic Opportunity (DEO) will be responsible for final review and approval of DOB. Funding assistance from another source prior to or concurrent with the Program's CDBG-DR grant award may be deducted from an applicant's total project cost "to the extent such assistance duplicates benefits available to the person for the same purpose from another source (Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C 5121-5207)".

All applicants will be required to execute a blanket eligibility release document that will authorize agencies to provide information regarding prior compensation. These agencies include, but are not limited to, Homeowner's Insurance Providers, Flood/Hazard Insurance Providers, Small Business Administration (SBA), NFIP, FEMA Individual Assistance, and FEMA Hazard Mitigation Grant Program (HMGP), Individual

Assistance (IA) and Public Assistance (PA). Acceptable documentation includes receipts and sworn statements/certifications that can be verified or substantiated.

The Program will require submission of all benefits during the full application vetting process, in order to assess all "Potentially Duplicative Assistance" to gauge "Assistance Determined to be Duplicative." Documentation that demonstrates rehabilitation and other recovery benefits will be requested for confirmation that those funds have not been allocated for the purpose current request. In addition, any "partial benefits" will be

considered, and "shall not preclude provision of additional Federal assistance for any part of a loss or need for which benefits have not been provided."

In addition, the applicant will be required to sign a Subrogation/Assignment instrument at the grant closing which requires applicant to return duplicative assistance received after the receipt of the grant award if such duplicative assistance was not considered in the grant award calculation. To the extent applicant incurred legal costs in obtaining an insurance payout, the costs and fees paid to attorney to obtain this insurance payout may be considered to reduce the duplication of benefits.

Eligible Activities

All projects identified by St. John's County will be submitted to the Florida Department of Economic Opportunity (DEO) for review and consideration of funding in accordance with DEO requirements. General requirements for funding include:

- Demonstrated relationship to Hurricanes Matthew
- Meeting a National Objective (Low-to-Moderate Income (LMI) benefit, Urgent Need, Elimination of Slums and Blight).
- Completion of a CDBG-DR Eligible Activity
- Duplication of Benefits (DOB) analysis

DEO will also consider to what extent proposed projects or programs support the following objectives:

- Addressing Unmet Housing Needs in the most impacted areas.
- Meeting 70% LMI Benefit threshold.
- Extent to which projects support LMI housing

Environmental Review Process

The purpose of the environmental review process is to analyze the effect a proposed project will have on the people and the natural environment within a designated project area and the effect the material and social environment may have on a project; and to determine whether it meets federal, state, and local environmental standards. The

environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users. Not every project is subject to a full environmental review (i.e., every project's environmental impact must be examined, but the extent of this examination varies), but every project must be in compliance with the **National Environmental Policy Act (NEPA)**, and other related Federal and state environmental laws. For more information, refer to <https://www.epa.gov/nepa>.

SJC must complete an environmental review of all project activities prior to obligating CDBG-DR funds. This requirement also applies to projects funded with CDBG-DR generated program income.

- The HUD rules and regulations that govern the environmental review process can be found at 24 CFR Part 58.
- The provisions of the National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ) regulations in 40 CFR Parts 1500 through 1508 also apply. Other federal and state laws and regulations (some of which are enforced by State agencies) also apply depending upon the type of project and the level of review required.

Environmental Review Record (ERR)

Each responsible entity must prepare and maintain a written record of the environmental review undertaken for each project. This written record or file is called the Environmental Review Record (ERR), and it must be available for public review upon request.

The ERR shall contain all the environmental review documents, public notices (and proof of their publication), and written determinations or environmental findings required by 24 CFR Part 58 as evidence of review, decision making and actions pertaining to a particular project.

- Written record of the review
- Must be available to the public
- Must include project description, maps, photographs, studies, consultation and other correspondence, public notices, programmatic agreements, etc.
- ERR must demonstrate compliance through the use of above referenced supporting documentation

Environmental review record is not complete without both broad-level and site-specific reviews

- Site-specifics must identify corresponding broad-level review
- Both parts should be filed together

- Compliance must be documented – including maps, consultation letters, checklists

Projects using CDBG-DR funds will not begin until the environmental review is completed by the County, or other approved contractor. Once completed, the ER will be reviewed by DEO, and approval to proceed will be determined by SJC.

ER will be completed by qualified individuals/companies properly procured and contracted with approval from DEO.

Two Stages of Review

Environmental reviews for scattered site housing projects that do not have specific houses identified prior to release of funding will be completed in two tiers of review as follows:

Tier I - Broad-level review:

- Identify and evaluate the issues that can be fully addressed and resolved, notwithstanding possible limited knowledge of the project
- ALSO, establish the standards, constraints, and processes to be followed in the site-specific reviews

Tier II - Site-specific reviews:

- Evaluate the remaining issues based on the policies established in the broad-level review as individual sites are selected for review

Program Income

In accordance with the CDBG-DR Subgrant Agreement, St. Johns County will report to DEO all program income (as defined by 24 C.F.R. 570.500) generated by activities carried out with CDBG-DR funds. In the event that St. Johns County receives program income such funds will be tracked separately from other CDBG-DR grant income in e-Finance, the County's internal financial system.

Upon receipt of any program income, CDBG-DR staff will remit the funds to the Clerk of Court for deposit and provide accounting information to post the funds to the appropriate project budget. Clerk of Court Finance staff will post the funds to a program income revenue account within the specified budget associated with the activity that generated the income.

Regardless of which program or sub recipient generated the program income, the use of any available receipted program income will be drawn from the funds available in the CDBG-DR account prior to grant funds being drawn from DEO, and documented on

the first available fund request generated, approved, and processed by the CDBG-DR staff. Use of the program income will be reconciled by the Grant Administrator and Accounting Technician for each program as part of the reporting process. All program income earned because of activities funded under this grant will be subject to alternate requirements of 24 CFR 570.489(e), which defines program income. The Grant Administrator will report program income to DEO in the Subrecipient's Quarterly Progress Report and receipted program income will be subject to applicable CDBG-DR.

Program income generated after grant closeout will be returned to DEO. Program income generated prior to closeout will be returned to DEO unless the program income is used to fund additional units of CDBG-DR activities, specified in a modification to the CDBG-DR Subgrant Agreement, and duly executed prior to administrative closeout.

Records Retention

SJC will adopt the DEO record retention policy located in the DEO Policies and Procedures manual. DEO requires SJC to maintain all program- and project-related documentation such as financial records, supporting documents, and statistical records. Per 24 CFR 570.490, these records must be retained for a period of not less than five (5) years after the physical year of the grant or three (3) years after grant closeout with HUD, whichever is longer. In addition, if any litigation, claim, negotiation, audit, or other action involving the records has been started prior to the expiration of the controlling period as identified above, the records shall be retained until completion of the action and resolution of all issues which arise from it, or until the end of the controlling period as identified

above, whichever is longer. The County shall ensure that audit working papers are made available to DEO, or its designee, CFO, or Auditor

The subrecipient will be provided with guidance and technical assistance regarding establishment of a filing system to keep records that is easy to use while providing an accurate account of activities for examination and review by the DEO disaster recovery grant manager, auditors, and local subrecipient staff. CDBG-DR records are subject to the Freedom of Information Act and relevant state laws regarding public availability. The filing system should be established on a project basis. Files should, to the extent possible, be maintained in a central location. SJC is subject to Chapter 119 of Florida State Statute governing public records.

Procurement Process

Procurement is the acquisition of goods and services to be used internally by the County to carry out the Program. The procurement process includes the decision to purchase as well as the process to complete the purchase. The federal government

has established a set of procurement rules at CFR Part 200 that apply to CDBG-DR funded projects. These rules are in place to ensure that federal dollars are spent fairly and encourage open competition for the best level of service and price. The County will procure and select all contractors for all construction projects using CDBG-DR funds. Homeowners will not be allowed to procure their own contractors.

SJC is required to submit a plan for compliance with Section 3 (24 CFR Part 135) requirements for the DR grantee approval prior to the start of construction on any contract activity.

Competition for all procurement transactions must follow the provisions of 2 C.F.R §§ 200.318-200.326 and be conducted in a manner providing full and open competition. SJC shall be alert to conflicts of interest as well as noncompetitive practices among contractors that may restrict or eliminate competition or otherwise restrain trade. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals shall be excluded from competing for such procurements. Awards must be made to the responsible and responsive bidder or offeror whose proposal is most advantageous to the program, considering the price, quality and other factors. Solicitations shall clearly set forth all requirements that the bidder or offeror must fulfill in order for the bid or offer to be evaluated by the administering agency. Any, and all bids or offers may be rejected if there is a sound, documented reason.

In accordance with Federal, State and Local law, the submitting firm shall not discriminate against any employee or applicant for employment because of race, color, religion, sex, national origin, or handicap. The submitting firm shall be required to comply with all aspects of the Americans with Disabilities Act (ADA) during the performance of the work.

It is the intent of the County to ensure that Disadvantaged Business or Small Business Enterprise (DBE/SBE), Minority Business Enterprise (MBE) and Women Business Enterprise (WBE) have equal opportunity to receive and participate in Federal assisted contracts and to uphold the following standards: To ensure nondiscrimination in the award and administration of Federal assisted contracts;

- To create a level playing field on which DBEs can compete fairly for Federal assisted contracts;
- To ensure that the DBE Program is narrowly tailored in accordance with applicable law:
- To help remove barriers to the participation of DBEs in Federal assisted contract: and
- To assist the development of firms that can compete successfully in the market place outside the DBE Program. If the consultant is not a DBE/MBE/WBE firm the contractor entering into an agreement for this project must meet the following criteria:
 - Achieve DBE/MBE/WBE participation by using DBE/MBE/WBE

- Subcontractors; or
- If unable to utilize DBE/MBE/WBE certified sub-consultants, must be able to submit documentation detailing the Good Faith Efforts made in utilization of potential DBE/MBE/WBE sub-consultants.

RFP and RFQ solicitations will also be sent to those vendors registered in the Certified Vendor Directory for the applicable services (<https://osd.dms.myflorida.com/directories>).

Davis-Bacon Labor Standards

The Davis-Bacon Act (DBA) applies to all construction contracts greater than \$2,000, unless the program's authorizing legislation contains exceptions. It requires that all workers or mechanics working on projects covered by the act be paid minimum hourly wages and fringe benefits according to the wage decision(s) applicable to that contract. If any portion of a contract requires DBA, then all work performed under the contract is subject to DBA. In the CDBG-DR program, only rehabilitation of residential property containing less than eight housing units is exempt from DBA. Work done by a local government's employees (force account) is not subject to DBA.

Additionally, contractors must comply with the Contract Hours and Safety Standards Act (CWHSSA) and the Copeland Anti-Kickback Act (Copeland Act). CWHSSA requires that, for any project in which the prime contract exceeds \$100,000, workers be paid one-and-one-half times their normal hourly rate for any hours worked in excess of 40 hours weekly, based on a work week of seven (7) consecutive days. The Copeland Act prohibits any person from inducing a worker on a federally funded project to give up any part of the compensation to which the worker is entitled. No payroll deductions are permitted that are not specifically listed in the Copeland Act unless the contractor has obtained written

permission from the employee as specified in 29 CFR 3.5 for otherwise permissible payroll deductions.

Davis Bacon does not apply to single-family scattered site rehabilitation and reconstruction programs.

The County is responsible for enforcement of the DBRA requirements, such as on-site interview of workers, review of contractor's payrolls, and conducting a pre-construction conference. In order to meet these requirements, the county will have construction monitors that are responsible for end-to-end management of the process to include the following:

- Developing pre-bidding requirements and contractual templates to meet all

CDBG- DR Construction and Labor Standards (which include Davis Bacon Wage Rates).

- Conducting pre-bid conferences with potential contractors to review Davis Bacon wage rates, payroll and reporting requirements. The pre-bid conference will also outline all job site posters related to labor standards, safety, and applicable wage rates in English and Spanish. The “Contractor Guide to Davis Bacon Wage Requirements and Certified Payroll Reports” will also be provided to potential bidders.
- Coordinating the collection weekly contractor payrolls and conducting worker interviews at least once during the construction process.
- Section 3 outreach and reporting.
- Review of all Contractor requests for payment and draw request preparation.
- Ensuring restitution of laborers not properly compensated on a project, if applicable.

Construction Categories

Under DBA, construction work is categorized as residential, building, heavy or highway work. Wage decisions are based on the category (or categories) of work to be performed. Each construction contract to which DBA applies must contain the wage decision(s) for the appropriate category (or categories) of work. A separate wage decision for a category is not required if the value of work (as bid) in that category does not exceed 20 percent of the total “as bid” construction cost. The actual bid cost, not the estimated project cost, determines whether a separate wage decision is used. If more than one wage decision is

used, payrolls must reflect which wage decision is applicable unless all workers are paid at least the highest hourly rate possible under either wage decision.

Wage Decisions

After determining the proper labor categories, the local government should request a wage decision by submitting a wage decision request form to the DEO disaster recovery grant manager. A copy of this form is available on the DEO disaster recovery website. Since wage decisions are subject to modification, the wage decision request should not be submitted earlier than 45 days prior to advertisement of the project.

If more than one wage decision is used, bidding instructions must identify which portions of the work are covered by each wage decision. It is not the responsibility of the contractor to make this determination. Lack of guidance or improper guidance may result in the local government being liable for any wage restitution.

The DEO disaster recovery program tracks wage decisions through the bidding and contract award phase to determine if a modification of a wage decision occurs. DEO will advise the local government if a modified wage decision may be required. The applicability of a wage decision modification is dependent on the bid opening date and the date the local government accepts the bid (i.e., the date the local government awarded the bid). Ten days prior to bid opening, the subrecipient must check to determine if the wage decision has been modified. If it has been modified, all potential bidders must be notified. If a contract has been awarded but construction has not been initiated within 90 days of the award, the subrecipient must determine if any modifications have been issued. If so, the contractor must be notified and adhere to the modified wage decisions.

The Bidding Information and Contractor Eligibility form advises DEO of the bid date for review of wage decision validity. A contract should not be awarded prior to DEO's verification that the contractor is eligible to participate in a federally funded contract. After contract execution and issuance of a notice to proceed, the local government should submit a copy of the notice and the minutes from the meeting at which the contract was awarded. A copy of the Bidding Information and Contractor Eligibility form is included on the DEO disaster recovery website.

Monitoring Construction Activities and Labor Standards

During project construction, the local government must monitor compliance with DBA, CWHSSA and the Copeland Act by reviewing contractor and subcontractor payrolls. DBA applies to laborers and mechanics working on any project when the primary contract exceeds \$2,000. It does not apply to supervisory staff if 80 percent of their time during the work week is spent performing supervisory duties. Supervisory personnel who fall below the 80 percent threshold are subject to DBA for non-supervisory hours worked during that particular work week.

"Self-employed owners" are not exempt from DBA and must submit a payroll report reflecting the hours worked on the project, the type of work performed and that they are the owner of their business. Hourly rates need not be reported if this information is not known, but the amount of the subcontract should be indicated.

Supply contracts are not subject to DBA. A supply contract is one that furnishes equipment, materials or supplies, with no (or only "incidental") construction activities

performed at the project site. Construction is “incidental” if it does not exceed 13 percent of the contract or subcontract price. There must be documentation to support this percentage.

During project construction, the local government must also conduct interviews with the contractors’ and subcontractors’ workers to verify the accuracy of payroll information. Interviews must cover a representative sample of each classification used by the contractor/subcontractor. On-site interviews should be conducted whenever possible, but mail interviews are acceptable if on-site interviews cannot be performed. Discrepancies between information gained in the interviews and payroll data must be resolved in a timely manner. Additionally, interviews and resolution of discrepancies should be conducted in such a manner as to shield the identity of the worker(s).

If a contractor or subcontractor is required to pay a cumulative total of more than \$100 in back wages during the contract period, the local government must submit an enforcement report to the DEO Disaster Recovery Unit. Any corrective actions by a contractor must be documented in the project files. For back wages over \$10, there must be a copy of the front of the wage restitution check and a signed acknowledgment from the worker stating the amount of the check and that it was received. If there are overtime violations, the local government must assess the contractor liquidated damages of \$10 per day/per worker for those who should have received overtime. Restitution is also required. The contractor may request waiver of liquidated damages through DEO.

DEO will monitor compliance with labor standards until the project is complete. A Labor Standards Monitoring Checklist is available on the DEO Disaster Recovery website. During monitoring visits, special attention will be given to the following:

- Ensuring payroll information is being submitted and reviewed in a timely manner.
- Ensuring all labor classifications are included in the wage decision or have been conformed and/or added with DEO approval.
- Ensuring trainee and apprentice labor classifications are applied in accordance with regulations for those titles.
- The helper, trainee or apprentice program must be certified by the Florida Office of Apprenticeship and Training. If trainees or apprentices are used, the contractor must provide a copy of the state certification to the subrecipient and the DEO disaster recovery grant manager.
- Ensuring signed authorizations are on file for any employees with “other” payroll deductions.
- Ensuring interviews have been conducted with the prime contractor’s and any subcontractor’s employees. HUD Form 11 can be used for interviews.
- In the case of multiple wage decisions, investigating payrolls to ensure that they

distinguish which was applied to each worker.

- Posting the wage-rate decision in a conspicuous location at the project site and posting a copy of “Notice to All Employees Working on Federal or Federally Financed Construction Projects” (a copy of this poster and other required posters are available at <http://www.dol.gov/whd/regs/compliance/posters/fedprojc.pdf>).

The Wage Request Process

This process may begin before or after the environmental review of the project.

- The subrecipient submits the Wage Decision Request(s) to DEO.
- Program staff gets the wage decision(s) from the U.S. Department of Labor website.
- Program staff prepares and signs the letter to the chief elected official informing the subrecipient of the wage decision(s).
- Program staff routes the wage decision letter to supervisory staff for their review and approval.
- After approval of the letter, program staff provide a copy for the grant file and mails the original letter to the subrecipient.
- The program staff enters a comment in the SERA system acknowledging the approval of the wage decision and includes the date the letter was mailed.
- If the wage decision changes, the program staff sends a letter to the subrecipient notifying the subrecipient of the change in the wage decision.
- The subrecipient must notify all potential bidders of a wage determination that occurs 10 days prior to bid opening. If a contract has been awarded but construction has not been initiated within 90 days of the award, the contractor must be notified and adhere to the modified wage decision.

Citizen Participation Plan

As required by CDBG rules, public meetings shall be held to provide information and discuss proposed activities to be undertaken, as well as address questions or concerns

from the public. Citizen participation plan is included in the General Policies and Procedures.

Affirmative Marketing Plan

St. Johns County is committed to affirmatively furthering fair housing through

established affirmative marketing policies.

An Affirmative Marketing Plan, based on the HUD regulations, will be submitted to DEO for approval. The plan outlines the policies and procedures for housing activities. Procedures are established to affirmatively market units financed through the Program. The procedures cover dissemination of information, technical assistance to applicants, project management, reporting requirements, and project review.

The goal is to ensure that, eligible persons from all racial, ethnic, national origin, religious, familial status, the disabled, "special needs," gender groups, and/or other populations least likely to apply, are:

- Fully informed of vacant units available for sale and / or rent.
- Encouraged to apply for purchase, rehabilitation, and / or rent.
- Given the opportunity to buy and / or rent the unit of their choice.
- Given the opportunity to rehabilitate their primary residence, which sustained damages due to disasters and/or its after-effects.

Program participants will be informed about available opportunities and supporting requirements via case managers, printed and electronic materials, publications, direct contact, and through the placement of flyers/posters in public facilities. This plan will focus on successful outreach to LMI areas and those communities with minority concentrations that were affected by the disaster.

In addition to marketing through widely available media outlets, efforts will be taken to affirmatively market the CDBG-DR Program as follows:

- Provide information on accessing CDBG-DR assisted rental housing on the County's Housing and Community Services website.
- Advertise with the local media outlets, including newspapers and broadcast media, which provide unique access for persons who are considered members of a protected class under the Fair Housing Act.
- Outreach to public or non-profit organizations
- Other forms of outreach tailored to reaching the eligible population
- Use of Fair Housing and Accessibility logos will be used on all applications, advertisements, and other outreach materials.

Applications and forms will be available in English and Spanish, or other formats when possible. In addition, every effort will be made to assist such applicants during the application process.

St. John County will conduct a Section 504 review of all programs to ensure that they are fully accessible to the public and will develop a Transition Plan (s), as necessary. In addition, the County will appoint a Section 504 Coordinator to address special needs of program applicants, coordinate reasonable accommodation requests, and conduct home bound visits as necessary. As part of the Section 504 evaluation process,

measures will be taken to make the programs accessible to persons who are considered members of a protected class under the Fair Housing Act by holding informational meetings in buildings that are compliant with the Americans with Disabilities Act (ADA), providing access to participant's preferred method of communication when requested, and accommodating those who are visually impaired when requested.

Applications and forms available in English and other languages prevailing in the region, in accordance with Title VI of the Civil Rights Act of 1964. In addition, every effort will be made to assist such applicants in the application process.

Documentation of all marketing measures used, including copies of all advertisements and announcements, will be retained and made available to the public upon request.

Multifamily rental programs must develop an Affirmative Marketing Plan for each development receiving CDBG-DR funding. The plan, pursuant to federal regulations, will outline strategies to inform the public about the housing opportunities, requirements/practices that the owner must adhere to in executing the Affirmative Marketing Plan, procedures that will be followed in soliciting applications, and a description of records that will be maintained and made available for review. Notice to Public Housing Authorities in the region in order to inform households on Disaster Housing Assistance Programs (DHAP) that permanent housing is available should be part of the Plan.

Evaluation of outreach activities and applications received will be necessary to determine if outreach is successful; and if the applications received accurately reflect the socioeconomic and other forms of demographic diversity identified in the Needs Assessment. Evaluation should be an ongoing process and begin no later than one month after the program begins accepting applications. The County will Provide these reports to DEO for review before qualifying applicants, and periodically thereafter.

The availability of the Program funds shall be advertised at a minimum through the following venues: local newspapers, local broadcast media, public or non-profit organizations, community meetings, other public groups, other outreach may include use of flyer in utility bills, church bulletins, and door to door outreach.

Evaluation of outreach activities and single- family applications received will be necessary to determine if single-family applications received are from a diverse population and ranges of income to ensure low/moderate income households receiving assistance in a proportion to the percentage of overall populations.

Applications and forms will be available in English and other languages prevailing in the region. In addition, every effort will be made to assist such applicants in the application process.

Affirmatively Furthering Fair Housing

As per HUD and DEO, SJC will affirmatively further fair housing as outlined in the Federal Register November 21, 2016, Vol. 81, No. 224, each project will undergo Affirmatively Furthering Fair Housing (AFFH) review. Such review will include an assessment of the proposed project area's demography, socio-economic characteristics, environmental hazards or concerns, and other factors material to the AFFH determination.

For purposes of the rule, affirmatively furthering fair housing “means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development.

The County, and its contractors and subcontractors agree to take meaningful steps to affirmatively further fair housing with the approved projects.

For purposes of the rule, meaningful actions “means significant actions that are designed and can be reasonably expected to achieve a material positive change that affirmatively furthers fair housing by, for example, increasing fair housing choice or decreasing disparities in access to opportunity.

The AFH Assessment Tool, information gathered from the National Low Income Housing Coalition, Census data, the Florida Housing Coalition, and the St. Augustine/St. Johns County Affordable Housing Advisory Committee, will be combined with local knowledge to analyze and assess local fair housing impediments. This information will help the County understand and identify local barriers to fair housing choice. The approach will maintain the County's effectiveness in affirmatively further the purposes and policies of the Fair Housing Act. Reports or other information containing data used will be published on the County website.

Fair Housing

The County, sub-recipients, and contractors receiving CDBG-DR funds shall comply with Title VIII of the Civil Rights Act of 1968, Restoration Act of 1987, Sec. 800 [42 U.S.C. 3601 note] (Fair Housing Act), as amended, 24 CFR Part 92.252, Fair Housing Rents, Title VI of the Civil Rights Act of 1964, Housing for Older Persons Act of 1995

(HOPA), Fair Housing Amendment Act of 1988, Age Discrimination Act of 1975, HCD Act of 1987, as amended, Section 109 of Title 1 of the Housing and Community Development Act of 1974 (570.487 and 570.495(b)), Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990 (ADA), Executive Order 11063, Executive Order 11259. The County shall also comply with 42 U.S.C. § 3604(f) (3), to ensure the design and construction of eligible multifamily dwellings include features of accessible design for disabled persons.

It is important to ensure that the County's CDBG-DR program does not discriminate against any class of potential applicants. All persons must be treated equally and not discriminated against on the basis of race, color, religion, sex, national origin, familial status, genetics and/or disability, when serving housing needs.

To further ensure equal access to HUD-assisted or Insured Housing, the County will comply with 24 CFR 5.105 (a)(2)(i) and (ii): This regulation requires equal access to housing in HUD programs, regardless of sexual orientation, gender identity, or marital status.

The Fair Housing Act is the term commonly used to describe the provisions of Title VIII of the Civil Rights Act of 1968, as amended in 1988. The Act states that it is unlawful to discriminate on the basis of race, color, religion, sex, national origin, familial status, genetics and/or disability. In addition to what is covered under the Federal act, Florida law also prohibits discrimination on the basis of marital status.

This language shall be included in all program information announcements and advertisements related to the housing program. It is important for County staff to be familiar with Fair Housing Laws, as well as the subtler forms of discrimination.

Where possible, application materials and handouts for applicant meetings shall be in English and Spanish. In addition, a multi-lingual representative of the organization receiving applications shall be present to assist Spanish-speaking applicants. Special arrangements may be required to accommodate auxiliary aids or language interpreter services, which can extend the application review process.

It is the County's policy to ensure that all state and federally funded projects and activities prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, on the basis of race, color, religion, sex, national origin, familial status, genetics and/or disability (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18).

Equal Opportunity Employment (EEO)

It is the County's policy to use state and federally funded programs to provide services to extremely low, very low and low-income persons. At no time will employment opportunities provided through the expenditure of state or federal funds or otherwise

be denied on the basis of race, color, religion, sex, national origin, familial status, genetics or disability.

Notice of the EEO policy shall be placed in plain sight on the job location for the benefit of interested parties. All EEO posters will be displayed as required by state and federal guidelines.

EEO protects all employees and the potential employment of all applicants and sub-recipients. These requirements apply at all times for any and all entities (County, sub-recipients, contractors, etc.) receiving state or federal funding.

Employment Opportunities

The County, sub-recipients, and all contractors receiving grant funds shall comply with the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (as amended), Section 3 Statute—12 U.S.C. 1701u, and Section 3 Regulation—24 CFR Part 135, 24 CFR 85.36(B)(8).

It is the County's policy to put forth its best efforts to afford Section 3 residents and Section 3 business concerns the maximum practicable opportunity to participate in the performance of all state and federally funded contracts. The County may rely on written representations by businesses and residents regarding their status as Section 3 in lieu of an independent investigation.

Every effort shall be made to notify Section 3 residents and businesses residing or maintaining offices in the local area through public notices, as part of complying with Section 3. Documentation of such efforts is required, and shall be maintained in the County's CDBG-DR files.

W/MBE Employment Opportunities

The County and its contractors shall comply with: Public Law 95-507, The Small Business Act, and Executive Order 11625 of 1971. The County shall put forth its best efforts to afford small businesses, minority business enterprises, and women's business enterprises the maximum practicable opportunity to participate in the performance of all state and federally funded contracts.

Financial Management

The SJC financial management system must comply with the provisions of 2 C.F.R part 200 (and particularly 2 C.F.R 200.302 titled "Financial Management"), section 218.33, F.S., and the rules promulgated thereunder, Rule 73C-23.0051(1), F.A.C. The CDBG-DR program will follow County Policy for establishing purchase orders and processing invoices. All invoices will be reviewed for accuracy for services performed. Invoices will require approval from CDBG-DR Grant Administrator prior to being sent to finance for

processing.

Codes of Conduct

SJC shall maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts. No employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the County shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. The standards of conduct must provide for disciplinary actions to be applied for violations of the standards by officers, employees, or agents of the County. (See 2 C.F.R § 200.318(c)(1).)

Business Hours

SJC shall have its offices open for business, with the entrance door open to the public, and at least one employee on site at all reasonable times for business. "Reasonable" shall be construed according to circumstances, but ordinarily shall mean normal business hours of 8:30 a.m. to 5:00 p.m., local time, Monday through Friday.

Licensing and Permitting

All contractors or employees hired by the County shall have all current licenses and permits required for all of the particular work they are hired to perform.

Conflict of Interest

The conflict of interest regulations contained in the contract between the County and the DEO prohibit local elected officials, SJC employees, and consultants who exercise functions with respect to CDBG-DR activities; or who are in a position to participate in a decision-making process; or gain inside information with regard to such activities, from receiving any benefit from the activity either for themselves; or for those with whom they have family or business ties, during their tenure or for one year thereafter. For the purposes of this section, "family" is defined to include parents, those related by marriage, grandparents, siblings, and children of an official covered under the CDBG-DR conflict of interest regulations at 24 CFR Sec. 570.489(h)).

Potential conflict of interest will be evaluated by County Staff, with guidance from the

County Attorney, to make a determination whether or not a conflict actually exist. If no conflict exist, DEO will be made aware of decision and will have the opportunity to re-evaluate the determination. Conflict of interest is identified as:

- “An unfair competitive advantage exists when someone competing for the award obtained:
 - Access to information that is not available to the public and would assist the vendor in obtaining the contract; or
 - Source selection information that is relevant to the contract but is not available to all competitors and that would assist the vendor in obtaining the contract.” (287.057(17)(b)2, Florida Statutes)

All contractors and subcontractors participating in CDBG-DR activities must certify that they presently have no interest and shall acquire no interest, either directly or indirectly, which would conflict in any manner with the performance of required services as provided herein. Respondents must certify that no person having any interest shall be employed for the performance of any of the required services as provided herein. Respondents are required to disclose to the County any and all potential conflicts of interest for any prospective business association, interest or circumstance, the nature of work the Respondent may undertake and request an opinion from the County, whether such association, interest, or circumstance constitutes a conflict of interest.

The County agrees to notify the Respondent of its opinion by certified mail within 30 days of receipt of notification by the Respondent. If, in the opinion of the County, the prospective business association, interest or circumstance would not constitute a conflict of interest by the Respondent, the County shall so state in the notification and the Respondent shall, at his/her option enter into said association, interest or circumstance and it shall be deemed not in conflict of interest with respect to services provided to the County by the Respondent under the terms of the contract.

Complaint/Appeals Process

Citizen complaints will be handled as required under the following regulations:

- 24 CFR 91.11(h) Citizen Participation Plan which states, “The citizen participation plan shall describe the State’s appropriate and practicable procedures to handle complaints from citizens related to the consolidated plan, amendments and performance report. At a minimum, the citizen participation plan shall require that the State must provide a timely, substantive written response to every written citizen complaint, within an established period of time (within 15 working days, where practicable, if the State is a CDBG recipient).”
- 24 CFR 570.486(a)(7) Local Government Requirements, which states, “Provide citizens the address, phone number, and times for submitting complaints and grievances, and provide timely written answers to written complaints and grievances, within 15 working days, where practicable.”

Resolution of complaints

The goal of St. Johns County is to resolve complaints in a manner that is sensitive to the applicant's concerns and achieves fair results. Regardless of the complaint, Program staff members will treat the issue with respect, respond to the applicant about the status of the complaint, and handle the issue quickly (within 15 working days, if feasible).

The applicant will have the opportunity to fill out a formal complaint form that is accessible on the disaster recovery website. The complaint form includes the applicant's name, contact information and nature of the complaint being filed. Information on how to file a complaint will be available at the program offices and included on printed materials as well as be available on the disaster recovery website.

Informal Complaints

Complaints that are brought forward in an informal manner—orally or revealed in the process of addressing another issue—will be addressed where possible regardless of the source of the complaint. Informal complaints or appeals can be made by applicants by phone at (904) 209.1280 or in person with a Case Manager at the Restore St. Johns office located at:

*Health and Human Services Building
200 San Sebastian View
Room 2206 (Egret Conference Room)
St. Augustine, FL 32084*

1. When responding to an informal complaint, the county or Restore St. Johns staff will obtain all pertinent information from the individual, including:
 - a. The issue raised.
 - b. The name of the individual reporting the complaint (if possible) and associated contact information; if no name or contact number is provided, then that will be noted and placed in an informal complaint file—either electronic or hard copy.
 - c. Any other information regarding the complaint.
2. The Case Worker will determine whether the issue can be addressed through verbal discussion without necessitating a formal complaint process. The Case Worker will also inform the Applicant of formal complaint process and indicate in the file that the Applicant was informed of how to file a formal complaint.
3. If a resolution cannot be met through the informal process and an applicant believes that the Program's determination of their funding award calculation, eligibility status, or construction workmanship is incorrect/does not meet standards, they can request a Formal Appeal Form from their Case Worker.

Formal Complaints

Formal complaints must be submitted utilizing the Formal Complaint Form (Exhibit One) available through the Restore St. Johns Office. The applicant will be informed of the complaint process and the availability of the Formal Complaint Form.

Formal Complaints require the name and contact information of the individual submitting the complaint. All complaints must originate from the individual seeking assistance from the program as a registrant, applicant, contractor, or other direct party. Any complaint forwarded to St. Johns County from the U.S. Department of Housing and Urban Development (HUD) and or Department of Economic Opportunity (DEO) will also be considered a formal complaint and processed in accordance with this policy.

Complaints may be submitted in the following ways:

Mail: St. Johns County
Restore St. Johns, Room 2206
200 San Sebastian View
St. Augustine, FL 32084

Email: cdbgdr@sjcfl.us

Hand Deliver: St. Johns County
Restore St. Johns, Room 2206
200 San Sebastian View
St. Augustine, FL 32084

1. Every formal complaint will be entered into the project tracking system and maintained as either an electronic or hard copy file. The project tracking system will note any complaints and their potential resolution.
2. Once the complaint is entered in the tracking system, the Program Manager or their designee will determine if the complaint has standing by determining the following:
 - a) The individual filing the complaint is a registrant or applicant, contractor, or direct party.
 - b) Associated contact information has been provided.
 - c) The complaint is relevant.
3. If the complaint is valid, the Program Manager or a designee will perform the following steps:
 - a) Review and/or investigate the complaint.
 - b) Once the complaint has been resolved, or if it needs more work than can be done at the local program level, refer the complaint to the Review Committee to seek resolution.
 - c) Provide documentation regarding the final result and resolution to St. Johns County if applicable.

- d) Provide a copy of this Policy relating to investigation and resolution to the complainant and to each person who is subject of the complaint.
- e) Notify the complainant of the results, or if longer than 15 working days, provide a status of the review process.
- f) Close the complaint.

DEO State Complaint Process

Citizen Complaints. The goal of the State DEO is to provide 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. All applications, guidelines, and websites will include details on the right to file a complaint or appeal and the process for filing a complaint or beginning an appeal.

Citizens may file a written complaint or appeal through the Disaster Recovery email at CDBGDR@deo.myflorida.com or submit by postal mail to the following address:

Attention: Chief, Community Disaster Recovery Florida Department of Economic Opportunity
107 East Madison Street
The Caldwell Building,
MSC 160 Tallahassee,
Florida 32399

DEO will handle citizen complaints by conducting:

- Investigations as necessary;
- Resolution; or
- Follow-up actions.

If the complainant is not satisfied by the SJC CDBG-DR Program determination or DEO's response, then the complainant may file a written appeal by following the instructions issued in the letter of response. If at the conclusion of the appeals process the complainant has not been satisfied with the response, a formal complaint may then be addressed directly to the regional Department of Housing and Urban Development (HUD) at:

Department of Housing & Urban
Development Charles E. Bennett
Federal Building
400 West Bay Street, Suite 1015
Jacksonville, FL 32202

The Florida Disaster Recovery Program operates in Accordance with the Federal

Fair Housing Law (The Fair Housing Amendments Act of 1988). Anyone who feels he or she has been discriminated against may file a complaint of housing discrimination:

1-800-669-9777 (Toll Free), 1-800-927-9275 (ITY) or
www.hud.gov/fairhousing.

Corrective action will be implemented where warranted.

Changes, Waivers, and Modifications

SJC has the right to change, modify, waive, or revoke all or any part of these guidelines, with the prior written approval of the DEO.

Waivers to the requirements in these Guidelines can only be approved by the DEO and must be

- Provided in writing. The DEO will provide the option for a waiver, only after the posting of the waiver request on the Department website for a public comment period of at least ten (10) days. The waiver request must demonstrate why the housing guidelines are not practicable for SJC.

In the event that these Guidelines conflict with local, state, or federal law, the more stringent requirement will prevail, provided that the requirement does not violate local, state or federal law.

Fraud

The County shall be committed to the highest standards of moral and ethical behavior by its employees, managers, elected officials, and constituents seeking assistance from the various housing programs being administered at any given time. The purpose of this requirement is to prohibit dishonest acts and/or fraudulent activity and to advise employees, managers, committee members, and elected officials of their responsibility in detecting, preventing, and reporting suspected fraudulent activity to the appropriate governing office. In addition, this program requirement assigns responsibility for the development of adequate internal controls and performance of investigations relating to fraud, waste, and abuse.

This requirement applies to any fraud, or suspected fraudulent behavior, involving employees, managers, and elected officials, as well as consultants, vendors, contractors, outside agencies, constituents and/or any other parties having a business relationship, contract, or partnership with the County. This requirement also applies to the employees of local boards, committees, agencies and commissions over which the County has the authority to require general policies to be followed. All levels of housing

program management are responsible for the detection and prevention of fraud, misappropriations, waste, and other inappropriate conduct as it pertains to the use of specific program funding.

Any fraud that is detected or suspected shall be reported immediately to the Program Supervisor, who will conduct or employ other appropriate CDBG-DR staff on his/her behalf, to conduct an objective and impartial investigation into the fraudulent activity, along with other applicable departments and/or law enforcement agencies, as deemed necessary. Any individual found to have engaged in fraudulent activity is subject to disciplinary action, the nature of which shall be determined by program regulations and relevant federal and state laws. This may include, but not be limited to, program, service, and/or employment dismissal, as well as prosecution by appropriate law enforcement authorities. Fraud is a willful or deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Fraud includes, but is not limited to, the following:

- Any dishonest or fraudulent act
- Forgery or alteration of any financial document used for the purpose of program eligibility
- Deliberately including and/or providing false information on the program assistance application
- Deliberately withholding any required information requested to properly determine eligibility status
- Destruction or concealment of records, income and/or assets
- Failure to disclose and/or an attempt to conceal any conflicts of interest relationships
- Failure to disclose and/or an attempt to conceal any required information on employment

Non-fraudulent irregularities and conduct are personal improprieties or other irregularities not constituting fraud. These include, but are not limited to, allegations of drug abuse or sale/distribution of same, vandalism, assault, murder, sexual offenses or other criminal activity. Suspected improprieties concerning employees, managers, committee members, elected officials, or constituents seeking assistance from the various programs administered by the County, as it pertains to moral, ethical, or behavioral conduct shall be resolved by the Grant Manager whenever possible.

Travel

In accordance with the CDBG-DR Subgrant Agreement DEO shall reimburse St. Johns County's CDBG-DR related travel costs in accordance with section 112.061, F.S. Any bills for travel expenses shall be submitted and reimbursed in accordance with section 112.061, F.S., and 2 C.F.R. 200.474. St. Johns County employees that charge their time to the CDBG-DR grant must additionally adhere to St. Johns County Administrative Code

Section 102 - Travel Policy for County Employees (See Appendix A). County employees will be reimbursed for travel expenses at the rates specified in the County Administrative Code providing that the County's rates are less or equal to the State's reimbursement rates. All travel authorization requirements must be met according to County Administrative Code, State Statutes, and Federal Regulations. Reimbursement of travel expenses submitted to DEO will be allocated to CDBG-DR projects in accordance with project time allocation for the corresponding travel period. CDBG-DR time logs will serve as backup to support project time allocation for the travel period.

APPENDIX A

St. Johns County Administrative Code

Section :	Administration	Date Issued:	January 1993 November 2006
		Revised:	April 2008
Title:	Travel Policy for County Employees	Reference:	F.S. 112.061 SJC 95-44

102.1 Purpose

To establish a uniform policy to minimize the cost of travel while providing a reasonable balance between the needs of the County and the employee.

102.2 Scope

All employees are subject to this policy. Civic leaders or citizens whose presence is requested, in writing, to travel are also subject to this policy. County vendors, if travel is necessary, will be reimbursed based on the limits of their contract. If none are provided for in the contract, then they are subject to this policy.

102.3 Policy

It is the policy of the County to pay the reasonable cost of travel for all County employees and others who may be properly authorized, herein referred to as employees, while conducting the business of the County or receiving training away from the normal job location.

102.4 Authorization

Each Department Head shall submit to the County Administrator or his/her designee, a request for travel/training funding for approval during the annual budget cycle. Travel/training approved in the budget does not need further approval and is to be administered by the Department Head. Subsequent requests for travel/training, not previously approved for out-of-state travel, must be approved by the County Administrator or his/her designee on the Pre-Travel Request Authorization Form (Exhibit C).

The Department Head, or his/her designee, must approve subsequent requests for in-state travel not previously approved. All subsequent travel requests are subject to the availability of sufficient travel/training appropriations. The Pre-Travel

Request Authorization Form must be completed for all travel that requires reimbursement.

102.5 Attendance

Attendees shall be limited in order to minimize the number of professional staff attending the same function. This will be determined when the budgeted travel/training is approved for the following year's budget. The County Administrator, or his/her designee, must approve any exceptions after budget adoption.

102.6 Transportation

Transportation for all travel/training activities will be by the most economical method available. 1026.1 Air Travel

102.6.1.1 Tickets should be issued no sooner than five (5) working days before departure unless there is a need to guarantee a special rate (super saver, i.e.). Approval from the County Administrator, or his/her designee, should be obtained prior to ticketing when the travel/training has not been budgeted.

102.6.1.2 Discounted airline ticket cancellation and cancellation or exchange penalty charges may be paid from county funds only if the cause for cancellation or exchange charges are in the best interest of the county. The cost of unused nonrefundable tickets, cancellation or exchange penalties incurred are allowable for the convenience of the county and if the traveler has to cancel a trip due to an illness of the traveler or death of a member of the traveler's immediate family, for which an employee is authorized to use sick or administrative leave. For non- employees, these costs may be paid in circumstances which the traveler would have been authorized to use sick or administrative leave if they had been a county employee. If a ticket is canceled for the convenience of the traveler, the non-refundable ticket, cancellation or exchange penalties may not be reimbursed from county funds. Departments and travelers should carefully evaluate the circumstances and risk of cancellation prior to purchase of discounted tickets. Vouchers or purchasing card transactions submitted for payment of unused nonrefundable tickets, cancellation or exchange penalties must include documentation indicating that the costs were necessarily incurred in conducting county business or the costs were incurred because of the illness of the traveler or the illness or death of a member of the traveler's immediate family. The unused ticket must be included in the voucher packet or supporting material for the purchase card reconciliation.

102.6.1.3 These penalties, if incurred, are to be similarly reported as an expense of travel under the "Other Expenses" section of the Travel Expense and Settlement Report with a written explanation. The

Department Head must make specific approval for this response.

102.6.1.4 All air travel will be by coach class service unless authorized by the County Administrator due to an employee's disability, if necessary to accommodate the employee's comfort or documented personal needs. When travel plans are definite and discounts can be applied then the most economical discount fares should be taken advantage of, such as a Saturday night stay-over. Approval of a Saturday night stay-over will require a net economic benefit to the County. It will be the responsibility of the Department Head, or his/her designee, to determine the net economic benefit and approve the Saturday night stay-over. A copy of the airline ticket must be attached to the Travel Expense and Settlement Report (Exhibit D).

102.3.1.5 Employees should be flexible as to time of day, carrier selection, and routing in order to obtain the lowest possible fare. Employees will not be required to depart before 7:00 a.m. or arrive after 9:00 p.m. under normal circumstances. Airport parking for County or private vehicles will be reimbursed. Parking receipts must be attached to the Travel Expense and Settlement Report.

102.6.1.6 Frequent flyer coupons or points may be retained by the employee provided they have obtained the lowest fare available with any carrier. Selection of higher fares and manipulation of the route for purposes of obtaining value coupons or points is prohibited.

102.6.1.7 The cost of fares is to be reported on the Travel Expense and Settlement Report and offset by the same amount, if prepaid, in the appropriate place. If the ticket is purchased directly due to unusual circumstances, the cost is to be reported on the Travel Expense and Settlement Report and a copy of the airline ticket attached.

102.6.2 Personal Vehicle and County Vehicle Use for Travel

Employees are to use County vehicles when traveling within the State. If the use of a County vehicle is not feasible, the Department Head may authorize the use of an employee's personal vehicle and reimburse for allowable expenditures. County vehicles will not be used for out-of-state travel without the permission of the County Administrator, or his/her designee. Parking fees, tolls, and gas will be reimbursed, but the receipts must be attached to the Travel Expense and Settlement Report. Valet parking is not a reimbursable expense unless the hotel/motel or meeting place requires such parking. A receipt showing this expense is required for reimbursement.

102.6.2.1 Personal Vehicle Travel

As stated in Section 102.6.2, a County vehicle should be used for all In-State travel unless circumstances prevent the use of such vehicle. Reimbursement for use of a personal vehicle out-of-state travel shall not exceed a comparable airfare (as if the employee had traveled by air) for such travel. The most economic airfare shall be determined as follows: The Department Head will require the employee to obtain a discounted airfare cost from a local travel agency or internet travel agency, such as Expedia® or Travelocity®, which would represent the airfare had they used air transportation. The airfare cost should be gathered at the time of Department Head approval at least 30 days in advance to avoid exorbitant costs. When travel by personal automobile is authorized, the employee may be reimbursed for allowable expenditures. When an employee uses their personal vehicle for County business, the employee will be reimbursed for mileage based on the following methods:

- 1) actual odometer reading to the nearest tenth of a mile
- 2) In-County Mileage Standards Chart (Exhibit E)
- 3) Florida Department of Transportation
www3.dot.state.fl.us/mileage/default.asp
- 4) point to point mileage per Map Quest

Reimbursement will be based upon the most direct route between the

point-of-destination and the employee's office. The reimbursement rate per mile is \$.445 as established by Florida Statute 112.061 and adopted by resolution. It will be calculated to three decimal positions and in all instances will be rounded down to the nearest cent.

If travel begins more than one hour before or one hour after the traveler's regular work hours, the point of origin may be the traveler's residence, provided that miles claimed may not exceed the actually driven. The traveler must start on the actual trip to claim mileage from his home. If the traveler has to go by the office then the trip will begin from the office. Example: Traveler must be at the airport at 7:00 a.m. The traveler's regular work hours do not start until 8:00 a.m. The traveler goes directly to the airport from his home. Since the traveler left home more than

one hour before the regular workday was to begin, he may claim mileage from home to the airport. Mileage is allowed to the airport from work headquarters or home, whichever is less, when performing authorized travel on behalf of the County.

All mileage must be shown from point of origin to point of destination and return to the nearest tenth of a mile, and must be computed using the approved methods stated above. Departure and return times must be shown.

Upon arrival, when an individual is traveling, vicinity mileage accrued while conducting official business is an allowable reimbursement, but must be shown as a separate item on the St. Johns County Voucher for Reimbursement of Travel Expenses Form (Exhibit F). Because Health and Human Services is a state funded program employees in that department must utilize the Department of Children and Families forms for travel accessible on the St. Johns County Intranet. Mileage is allowed to the airport from office or home, whichever is less, when performing authorized travel and the preceding paragraph is applicable.

County employees will not be paid mileage allowance for travel between their residence and their work headquarters or regular work location. For the purpose of this policy, and IAW FS112.061 (4), St Augustine, Florida is the work headquarters and/or regular work location of St Johns County and the surrounding vicinity regardless of the location's proximity to Jacksonville. This allows management's control of staff work locations and assignments on a daily basis with proper notification of any changes given to county staff. At least 12 hours notice of the change constitutes proper notification to direct staff to report to a different work location on the following day. This is in conformity with section (4)a, FS112.061. Reimbursement of any travel expense incurred in traveling from home to work or work to home is unauthorized; including after hour additional work assignments or job requirements.

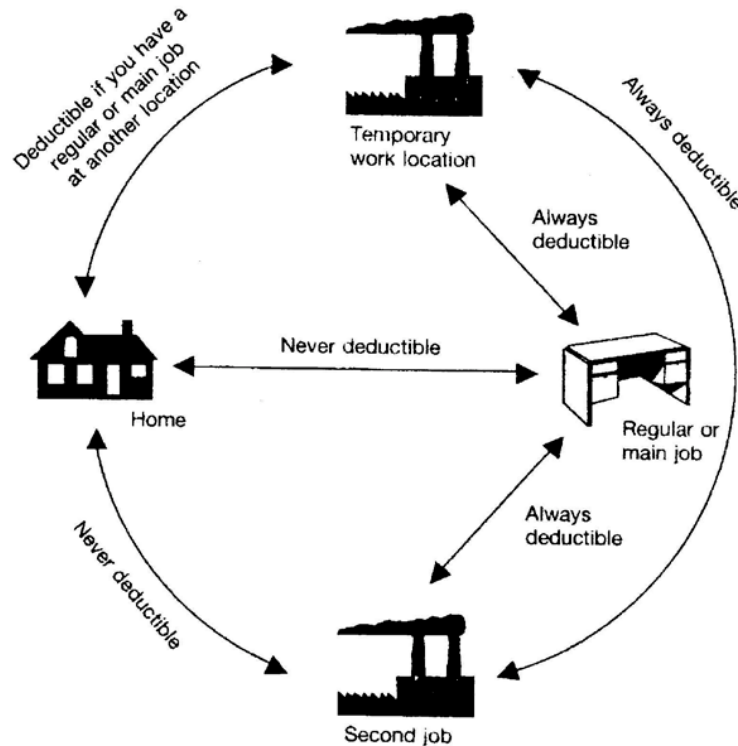
Employees who, as part of their day-to-day duties and responsibilities, use their personal vehicles on a regular and ongoing basis to travel to temporary work locations within the surrounding vicinity of the county or other local geographic areas included in their areas of responsibility to serve clients or for other official county business, must utilize St. Johns County Voucher for Reimbursement of Travel Expenses Form (Exhibit F). Again employees under the direction of the Health and Human Services Director must utilize the forms provided by the Department of Children and Families located on the Intranet.

The accompanying Figure 1, on the following page will be utilized in determining whether the reimbursement is applicable in a given situation and how to calculate the allowed mileage for each circumstance. Other travel limitations may be applicable regarding the employee's reimbursement request if additional written intra-departmental guidelines and operating procedures exist. Employees are required to know what guidelines and procedures are applicable to them.

If more than one employee attends the same meeting or conference they are required to ride together and have only one reimbursement for mileage. This would apply to a maximum of four persons, assuming the trunk capacity will hold their luggage. Department Head approval is required if the employees do not ride together.

Figure 1

When Are Transportation Expenses Deductible?



Home: The place where you reside. Transportation expenses between your home and your main or regular place of work are personal commuting expenses.

Regular or main job: Your principal place of business. If you have more than one job, you must determine which one is your regular or main job. Consider the time you spend at each, the activity you have at each, and the income you earn at each.

Temporary work location: A place where your work assignment is realistically expected to last (and does in fact last) one year or less. Unless you have a regular place of business, you can only deduct your transportation expenses to a temporary work location outside your metropolitan area.

Second job: If you regularly work at two or more places in one day, whether or not for the same employer, you can deduct your transportation expenses of getting from one workplace to another. You cannot deduct your transportation costs between your home and a second job on a day off from your main job.

Source: IRS Pub. 463, "Travel Entertainment, Gift, and Car Expenses (for use in preparing 2003 returns)."

102.6.2.2 Vehicle use guidelines for travel within a point-of-destination:

102.6.2.2.1 When the employee arrives at his/her destination actual reasonable expenses will be paid for local public transportation, such as taxi or bus from the airport to the hotel, connected with out-of-town travel on County business. Travelers are expected to use the most reasonable and economical means of transportation available. Personal vehicle mileage must be documented on the St. Johns County Voucher for Reimbursement of Travel Expenses (Exhibit F) for every trip. For example, trips to dinner, or a meeting place must each be documented separately. Reimbursement for travel to and from the airport from the traveler's office or home or the return trip from the airport to the traveler's office or home may include private vehicle mileage; or vicinity mileage with each trip noted on the St. Johns County Voucher for Reimbursement of Travel Expenses Form and submitted with the Travel Expense and Settlement Report; and direct parking costs or necessary taxi or limousine services.

102.6.2.2.2 Car Rentals

Employees, under exceptional circumstances and with the prior approval from their Department Head, may rent a car upon reaching their destination. Employees should rent a car with a cost equal to a compact car, unless otherwise approved, with a per diem rate excluding mileage (unlimited mileage). Collision and liability insurance should be purchased by electing "LDW" (Loss Damage Waiver) and "LIS" (Loss Insurance Supplement) coverage. Receipts evidencing car rental must be submitted with the Travel Expense and Settlement Report.

102.6.2.2.3 Taxis

The County will reimburse reasonable cost of taxi use to and from designated lodging, to and from place of business and to and from restaurants within a reasonable distance from place of business or lodging. Receipts are required for reimbursement.

102.7 Lodging

Lodging expenses will be reimbursed at the actual cost of the room provided that the employee seeks reasonable priced lodging subject to their Department Head's approval. Employees should take full advantage of special convention/program agency negotiated rates. The County will only reimburse the employee for single occupancy rates. Double occupancy by two (2) employees is encouraged; in such case the County will reimburse the double occupancy rate. If a spouse occupies a room with the employee, the employee must provide written or printed

documentation of the single and double room rate. Employees are responsible for no-show fees unless emergency or other approved business reasons cause the cancellation. Employees should always obtain a cancellation number from the designated hotel/motel to protect against no-show billings. Funds prepaid by the County, which relate to cancel arrangements not approved by the County Administrator, will be subject to repayment to the County by the employee. Employees are not authorized reimbursement for over-night accommodations for travel within 50 miles of St. Johns County unless deemed necessary and approved by the Department Head as an exception to policy.

102.8 Meals

102.8.1 One Day Travel: Class "C" Travel

Generally, the County will not reimburse the cost of meals unless the meal is part of the program or function being attended.

102.8.2 Overnight Travel Class "A" and Class "B"

The County will reimburse meal expenses (excluding tips) on trips requiring overnight accommodations. On the day of departure, breakfast may be reimbursed if the employee leaves their place of residency prior to 6:00 am, lunch is reimbursed if departure is before 1:00 pm and dinner if departure is before 8:00 pm. On the day of return, lunch may be reimbursed if return to the County is after 2:00 p.m. and dinner may be reimbursed when travel extends up to 8:00 p.m. Reimbursement for meals (excluding tips) is limited to expenses incurred during the day or part of day whichever is applicable and is limited in total to the daily individual meal allowance set out below.

During the traveler's stay, breakfast will not be reimbursed if a continental breakfast is provided by at the traveler's living accommodations while they are traveling or at the conference that they are attending.

Meal	
Breakfast	\$6.00
Lunch	11.00
Dinner	<u>19.00</u>
Daily Total	\$36.00

Individual meal expenses are not limited to the per meal cost allowance as set forth above, however, the total actual reimbursement for each day may not exceed the daily sum of the applicable individual meal allowance. (For example, a person may spend \$8.00 for breakfast, \$10.00 for lunch and \$18.00 for dinner for a total of \$36.00). A partial day reimbursement is applicable if the time covers one part of the day or if meals are included in conference fees, airline transportation or are otherwise not applicable.

The County will not reimburse meal costs that are included in registration fees or

airline fares. A copy of the conference/training brochure, which provides the detail of meals and scheduled events, must be submitted with the Report. Meals included in the registration should be shown in the "Meals" section and noted as such in the Travel Expense and Settlement Report.

102.9 Other Expenses

102.9.1 Safe Arrival Telephone Call

The employee may make a safe arrival telephone call. The County will reimburse a maximum \$5.00 for such call. For reimbursement purposes the call must properly document, for example, on a calling card bill or hotel/motel bill.

102.9.2 Business Calls

Business calls are fully reimbursable and each call must be listed on the Travel Expense and Settlement Report as to who called and the topic of discussion. If there is more than one line needed to list several business calls, attach a separate sheet listing the required information.

102.9.3 Flight Insurance

The purchase of flight insurance is not reimbursable because the County and most travel agencies insure their travelers.

102.9.4 Travel Allowance Advance

Employees with Department Head approval may receive a travel allowance advance by submitting the appropriate documentation (Request for Check form) five (5) days in advance of the day of departure. Amounts less than \$50.00 will not be advanced, and if practical only one advance should be made for all employees going to the same function.

102.9.5 Miscellaneous Expenses

Special event expenditures at conferences and seminars (i.e. banquets, golf tournaments, side trips, etc.) are not reimbursable. Gratuities, tips, baggage handling, etc. are also not reimbursable.

102.9.6 Internet Usage

Employees that must check their Business related email while traveling on County business will be allowed reimbursement for actual charges incurred.

102.10 Travel Reimbursement Forms Submission

The Travel Expense and Settlement Report, Voucher for Reimbursement of Travel Expenses, and all supporting documentation including receipts and the conference itinerary must be completed with the proper approvals and forwarded to the Finance Director within ten (10) working days after the return to the County. If any charges were incurred on a personal credit card a copy of the statement must also be included, with all but the last four digits of the CC# blacked out as well as any personal charges. Use of a personal credit card is highly discouraged. The advance travel allowance is borrowing from the County and must be accounted for within

ten (10) days after return to the County. The Finance Director is authorized to deduct the advance travel from the employee's salary as a means of settlement.

102.11 Conflict of Law

It is the intention of the Board of County Commissioners that this policy is in accordance with Florida Law. If any provision of this policy is in conflict with Florida Law, Florida Law shall prevail.



St. Johns County
Pre-Travel Request and Authorization

Date Submitted: _____

ty Administrator / Asst. County Administrator / Department Head

County Business authorization is requested for: _____
(Name and Position)

To Travel From: _____ to _____
(City & State) (City & State)

For the purpose of (Please list Points of Contact and Subject Material): _____

I plan to leave the County at _____ AM / PM on _____

Prepaid	Check	Amoun	Estimated Cost of	Amoun
Registratio		\$ _____	Meals	\$ _____
n Air Fare		_____	Lodgin	_____
Hotel		_____	g	_____
			Transportation	
Travel Advance		_____	Registration	_____
Other		_____	Car	_____
			Rental	_____
Total Prepaid Fees		\$ _____	Other	\$ _____
			Total Cost of Trip	

Mode of Transportation

ST. JOHNS COUNTY - BOARD OF COUNTY COMMISSIONERS TRAVEL EXPENSE & SETTLEMENT REPORT



Name & Dept: _____ Date Submitted: _____

Date & hour departed: _____ Date & hour returned: _____

Points of Contact (list host organization and/or individuals contacted and telephone number): _____

Description of Subject Material (briefly describe focus of the subject): _____

Meals: Meal Reimbursement only for Class "A" & "B" Travel (Overnight Stay) Administrative Code 102.8 - Mileage and Per Diem Expense Reimbursement Rates per Resolution 2006-223

Date (List Each Day)	Breakfast (\$6.00)	Lunch (\$11.00)	Dinner (\$19.00)	Total
			Total Meals:	\$
Mode of Transportation:				
Airline Ticket				
Private Vehicle Mileage* (\$.445 cents per mile) = _____ Vicinity miles must be documented on the SJC Travel Voucher Form, with each trip documented.				
Taxi or Other Ground Transportation				
Hotel/Motel Bill*				
Telephone: *Safe Arrival Telephone Call max. \$5.00 Business (to whom): _____ Business Subject: _____				
Registration Fees:*				
Other:* Tolls / Parking				
Miscellaneous: (List)				
Total Travel:				\$
Less Expenses Prepaid by the County:				(-)
Personal Charges: (FOR FINANCE USE ONLY)				(-)
Total Amount Due: _____ ACCOUNT NUMBER: _____				\$

I certify the travel expenses hereon are accurate and in accordance with the travel policy of the St. Johns County Board of County Commissioners and that all compensation claimed was of a business nature.

*Copy of airline ticket, motel/hotel bill and notice of registration fees, program schedule, and other pertinent receipts **MUST** be attached for settlement.

Submitted by: _____ Approved: _____ Date: _____

Exhibit E	County Admin, Sheriff, COC																									
	Main Library	Fire Rescue Admin	St Augustine City Hall	Utility Admin	Excelsior Building	Public Works / Road & Bridge	Health and Human Services	Ampitheatre	Utility (Inman Rd)	Facilities Maintenance	St Augustine Beach City Hall	Agricultural Center	Parks & Recreation (Main)	Anastasia Library	Pet Adoption / Stratton Transfer	Animal Control Office	Tillman Ridge Landfill	SJC Golf Course	Southeast Library	Hastings Annex / Library	Northwest Annex	Parks & Recreation (Mills Field)	Ponte Vedra Annex	Bartram Trail Library	Ponte Vedra Library	
County Admin, Sheriff, COC	2	2	4	4	4	5	6	6	6	7	7	8	8	8	9	10	11	11	13	21	22	23	24	24	26	
Main Library	2	4	2	4	2	4	3	4	6	5	5	7	6	6	11	10	9	9	11	19	24	25	22	26	24	
Fire Rescue Admin	2	4	5	2	6	3	7	7	5	7	9	6	9	10	11	9	9	11	14	21	24	25	26	26	28	
St Augustine City Hall	4	2	5	4	1	5	3	3	7	4	4	8	4	5	13	11	8	8	10	18	25	27	23	28	25	
Utility Admin	4	4	2	4	5	1	5	7	2	5	8	4	8	9	13	7	8	9	13	19	22	24	26	24	28	
Excelsior Building	4	2	6	1	5	6	3	7	4	5	9	5	5	5	13	11	8	9	10	19	26	27	24	28	26	
Public Works / Road & Bridge	5	4	3	5	1	6	6	8	2	6	9	3	9	10	13	6	9	10	13	20	22	23	26	24	28	
Health and Human Services	6	3	7	3	5	3	6	4	8	3	3	9	3	4	14	12	9	7	7	17	27	29	25	29	27	
Ampitheatre	6	4	7	3	7	3	8	4	9	6	1	11	2	2	15	14	11	10	11	20	27	29	25	30	28	
Utility (Inman Rd)	6	6	5	7	2	7	2	8	9	8	11	2	10	11	14	5	10	9	15	19	21	22	27	23	30	
Facilities Maintenance	7	5	7	4	5	4	6	3	6	8	6	9	5	6	16	12	8	6	7	16	28	29	27	30	29	
St Augustine Beach City Hall	7	5	9	4	8	5	9	3	1	11	6	12	1	1	16	15	12	10	10	20	29	30	27	31	29	
Agricultural Center	8	7	6	8	4	9	3	9	11	2	9	12	12	13	15	5	12	10	16	20	21	23	28	23	30	
Parks & Recreation (Main)	8	6	9	4	8	5	9	3	2	10	5	1	12	2	17	15	11	9	10	19	29	31	27	32	29	
Anastasia Library	8	6	10	5	9	5	10	4	2	11	6	1	13	2	17	16	13	11	9	21	30	31	28	32	30	
Pet Adoption / Stratton Transfer	9	11	11	13	13	13	14	15	14	16	16	15	17	17	15	11	19	20	22	30	13	15	15	15	17	
Animal Control Office	10	10	9	11	7	11	6	12	14	5	12	15	5	15	16	15	11	13	19	16	21	23	28	23	30	
Tillman Ridge Landfill	11	9	9	8	8	9	9	11	10	8	12	12	11	13	19	11	5	12	13	30	32	31	31	31	33	
SJC Golf Course	11	9	11	8	9	9	10	7	10	9	6	10	9	11	20	13	5	10	13	28	30	31	31	31	33	
Southeast Library	13	11	14	10	13	10	13	7	11	15	7	10	16	10	9	22	19	12	10	13	34	36	33	37	35	
Hastings Annex / Library	21	19	21	18	19	19	20	17	20	19	16	20	20	19	21	30	16	13	13	36	38	41	37	43		
Northwest Annex	22	24	24	25	22	26	22	27	27	21	28	29	21	29	30	13	21	30	28	34	36	2	20	3	22	
Parks & Recreation (Mills Field)	23	25	25	27	24	27	23	29	29	22	29	30	23	31	31	15	23	32	30	36	38	2	21	1	24	
Ponte Vedra Annex	24	22	26	23	26	24	26	25	25	27	27	28	27	28	15	28	31	31	33	41	20	21	22		2	
Bartram Trail Library	24	26	26	28	24	28	24	29	30	23	30	31	23	32	15	23	31	31	37	37	3	1	22		24	
Ponte Vedra Library	26	24	28	25	28	26	28	27	28	30	29	29	30	29	30	17	30	33	33	35	43	22	24	2	24	

EXHIBIT F

St. Johns County Voucher For Reimbursement of Travel Expenses



Employee: _____

Department: _____

Employee #: _____

Date	Travel Performed From Point of Origin to Destination	Purpose or Reason	Hour of Departure	Hour of Return	Point to Point Miles Claimed	Vicinity Miles Claimed	Total Miles
I hereby certify that the above expenses were actually incurred by me as necessary travel in the performance of my official duties; my attendance was directly related to official duties of the department; and that this is true and correct in every material matter and conforms in every respect with the requirements of the St. Johns County Administrative Code Section 102 and Section 112.061 of the Florida Statute.					Column Total	Column Total	Summary Total
							x \$.445 per Mile
					Total for Reimbursement		\$ -

Traveler's Signature: _____

Traveler's Title: _____

Date Prepared: _____

Account Number: _____

Supervisor's Signature: _____

Supervisor's Title: _____

Date Approved: _____

Admin Exhibit F, 7/06

