

Standard Operating Procedures

Escambia Voluntary Home Buyout Program

Escambia County, FL



Escambia County Voluntary Home Buyout Program (VHBP) / Standard Operating Procedures

Version Control

Version	Date	Notes
1.0	October 2024	First Version of VHBP CDBG-DR processes
2.0	March 2026	Revised to include Introduction and Final Disposition section articulating relationship of VHBP procedures to established County procedures and HUD policies, namely, Policy Sections 46-139 “Acquisition of Real Property by the County” and 14-37 “Property Maintenance”

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Introduction

The Voluntary Home Buyout Program (VHBP) is built on the processes already established by County municipal code (see Policy Section 46–139 “Acquisition of Real Property by the County”). This process includes, but is not limited to, the number of appraisals required relative to property value, environmental assessments, and negotiation of sale. These processes are intended for program staff to process VHBP program applications from intake through closing.

Although not a process unique to the VHBP, details on final disposition of properties acquired through the VHBP are identified later in this document.

Unless otherwise noted, all property acquisitions are tracked in the VHBP system of record. Long-term maintenance of properties is managed by Escambia County Public Works as part of their standard land management portfolio (see Policy Section 14–37 “Property Maintenance”).

Other Important Documents

- Definitions of Terms and Acronyms
- Naming Conventions

Standard Operating Procedures: CDBG-DR

These standard operating procedures are intended to be used by VHBP staff working through applications, from intake through closing. Procedures and any referenced policies are intended to be followed closely. Questions should be raised to the VHBP Program Manager.

Case Management

Applicants are to be contacted at least once every 30 days and recorded into the System of Record along with notes on contact attempts and a record of engagement.

1. Case Managers record attempted contact into the System of Record by following these steps
2. Open up QuickBase (Chrome is the recommended browser).
3. Select “Properties” from the navigation bar on the left-side of the screen.
4. Sort by “Grant Manager” to easily identify the cases assigned to you or another Case Manager.

Process Overview

Modifying Records in QuickBase

1. Open up Quickbase (Chrome is the recommended browser).
2. Select "Properties" from the navigation bar on the left-side of the screen.
3. Sort by "Grant Manager" to easily identify the cases assigned to you or another Case Manager.
 - a. To sort, hover your cursor over the "Grant Manager" header on that column and select the three vertical dots that appear on the lower left.
 - b. Select "Group A to Z" or "Group Z to A", as appropriate
4. Navigate to the first column labeled "Priority No." and identify the file you want to update.
5. Select the pencil icon from the three icons in the first column.
6. Using the arrows on the upper left of the case record navigate to the tab you want to update.

Recording Homeowner Engagement

Any homeowner engagement must always be recorded in the System of Record. To record an engagement, Case Managers and other program staff will follow these steps:

1. Using the arrows on the upper left of the case record navigate to and select the "Communication & Documentation" tab
2. **To document an Interaction & Case Note**
 - a. Navigate to the "Interactions & Case Notes" section and select "New Interactions"
 - b. Navigate to the "Recorded By" field and verify your name is listed or select the appropriate name from the dropdown on the right of that field.
 - c. Navigate to and enter the date and time of the engagement in the "Date Recorded" field.
 - d. Navigate to and select the appropriate engagement type from the "Type" drop-down.
 - e. Navigate to the "Property Parcel ID" field and verify the appropriate homeowner's name(s) is listed.
 - f. Navigate to and add detailed notes of the engagement in the "Notes" Section.
 - g. Once the record has been updated, select "Save & Close" to save and exit the current screen.

3. To document a Meeting

- a. Select "New Interactions"
- b. Navigate to the "Interactions & Case Notes" section and select "New Interactions"
- c. Navigate to the "Recorded By" field and verify your name is listed or select the appropriate name from the dropdown on the right of that field.
- d. Navigate to and enter the date and time of the engagement in the "Date Recorded" field.
- e. Navigate to and select the appropriate engagement type from the "Type" drop-down.
- f. Navigate to the "Property Parcel ID" field and verify the appropriate homeowner's name(s) is listed.
- g. Navigate to and add detailed notes of the engagement in the "Notes" Section.
- h. Once the record has been updated, select "Save & Close" to save and exit the current screen.

Uploading Documents to QuickBase

1. Navigate to and select "New Document" from the "Documents" section.
2. Verify the document has not already been uploaded.
 - a. If the document has already been uploaded
 - i. [needed]
 - b. If the document has NOT already been uploaded
 - i. Navigate to the "Document Type" field and select the appropriate name from the dropdown on the right of that field.
 - ii. Navigate to and enter the current date in the "Date Uploaded" field.
 - iii. Navigate to and select "Upload file" and select the file you want to upload.
 - iv. Navigate to "Related Interactions" to search for and select an interaction you wish to associate the document with, if applicable.
 - c. Navigate to the "Property Parcel ID" field and verify the appropriate homeowner's name(s) is listed.
 - d. Once the record has been updated, select "Save & Close" to save and exit the current screen.

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Viewing Documents in QuickBase

1. Using the arrows on the upper left of the case record navigate to and select the "Communication & Documentation" tab
2. Navigate to the "Documents" section and search for the specific record, if known, or scroll through available uploaded documents to identify the needed file.
3. Click eye icon next to document to open/view document

Documenting Participation in QuickBase

1. Using the arrows on the upper left of the case record navigate to and select the "Intake" tab
2. Navigate to the "Verified Participation" section
3. Enter the current date, or date a participation determination was made for or by the applicant
4. Navigate to and select the appropriate "Participation Outcome" from the dropdown on the right of that field.
5. Once the record has been updated, select "Save" to save and exit the current screen.

Mailing Process

1. If document mail out is needed, an email with all pertinent details and mailing documents must be sent to the Project Coordinator.
2. Project Coordinator will coordinate with appropriate County staff for mail out.

Intake

During the intake process, VHBP staff will collect documentation to address all aspects of the VHBP for applicants and co-applicants. Only eligible properties may apply for the program, and of those who apply to the program only eligible homeowners will be able to receive CDBG-DR funds.

1. Documentation Intake
 - a. Case Managers will **first**
 - i. Reach out to property owners to explain the program and gather initial interest.
 1. Initial contact will follow approved VHBP talking points:
 - a. [Escambia Voluntary Home Buyout Program \(VHBP\) – Case Manager Talking Points – All Documents](#)
 2. And begin with email of the introductory letter:
 - a. [Escambia Voluntary Home Buyout Program \(VHBP\) – Letters to Property Owners – All Documents](#)

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b. Case Managers will **second**

Provide residents with the following for preliminary intake:

i. Application Packet

1. **Notice of Voluntary Interest** – Confirmation that homeowners know this program is voluntary and they can backout at any time during the process.
2. **Declaration and Release** – Confirmation that homeowners are citizens.
3. **Duplication of Benefits** – Homeowners need to outline any SBA Loans, Flood Insurance for Structure Repairs, FEMA Individual and Family Grant, Emergency Minimal Repair Grant (EMR) and FEMA Disaster Housing benefits they have received.
4. **Privacy Act Release** – Confirmation that homeowners grant permission for their flood insurance coverage and claim information, and information about disaster assistance payments received to County officials (this information will not be made public).

ii. Right of Entry (ROE): [VHBP Buyout Right of Entry Form.docx](#)

iii. [Income Certification Disclosure Form.docx](#)

- iv. If household members report no income, Case Managers will provide the Zero Income Certification with direction to applicants to have the form completed and returned by as many household members claim zero income: [VHBP Certification of Zero Income.docx](#)

2. Receiving Initial Intake Documentation

a. Upon receipt of materials, Case Managers will do the following:

i. **Application Packet:**

1. Case Managers are to review the Application Packet and verify names, dates, and addresses are all consistent and legible.
2. Case Managers will contact Applicants and work with them to verify details of the documentation until complete.
3. Once the document is complete, Case Managers will upload the application packet to the appropriate file using approved naming conventions and protocol for uploading documentation.

ii. **Right of Entry:**

1. Case Managers are to review the Right of Entry and verify names and addresses are all consistent and legible.
2. Case Managers will contact Applicants and work with them to verify details of the documentation until complete.

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3. Once the document is complete, Case Managers will upload the Right of Entry to the appropriate file using approved naming conventions and protocol for uploading documentation.
- iii. **Income Certification and Disclosure Form:**
 1. Case Managers are to review the Income Certification and Disclosure Form and verify names and numbers are all consistent and legible.
 2. Case Managers will contact Applicants and work with them to verify details of the documentation until complete.
 3. Once the document is complete, Case Managers will upload the Right of Entry to the appropriate file using approved naming conventions and protocol for uploading documentation.
3. Preliminary Intake Income Verification
 - a. Case Managers will use HUD's Income Calculator to verify income based on the Disclosure Form (<https://www.hudexchange.info/incomecalculator/>) and Guidelines (https://files.hudexchange.info/resources/documents/CPDIncomeEligibilityCalculator_User_Manual.pdf) to establish household income levels
 - i. Navigate to and select "Go to My Dashboard"
 - ii. On the next page, select a program and start a new calculation by selecting "Community Development Block Grant (CDBG)" from the dropdown
 - iii. Select "Start" to advance to the next page
 - iv. Select "Low/Mod – Housing" from the radio buttons
 - v. Select "Continue" to advance to the next page
 - vi. Enter the Property ID digits (two or three-digit number listed in Quickbase under "Property ID") for the "1-6 characters...Beneficiary ID for this household"
 - vii. Select the appropriate number of household members under the "How many members are in in this household?"
 - viii. Select "Continue" to advance to the next page
 - ix. Identify household members numerically based on the digits assigned to each household member listed on the "Income Certification and Disclosure Form"
 - x. Select each of the boxes that apply to each household member (**NOTE:** some household members may not have any checked boxes)

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- xi. Select "Continue" to advance to the next page
- xii. Select "Florida" from the "State" dropdown
- xiii. Select "Pensacola-Ferry Pass-Brent, FL MSA" from the "Area" dropdown
- xiv. Select "80%" from the "Applicable 2024 Income Limit for household size in area" drop down
- xv. Select "Continue" to advance to the next page
- xvi. Select "No" when asked if "Low Income Housing Tax Credits" are involved
- xvii. For Annual Income
 1. If all household members have provided a 1040, select "IRS Form 1040 Adjusted Gross Income" and select "Continue" to advance to the next page
 2. If some or none of the household members have provided a 1040, select "24 CFR Part 5 Annual Income" and select "Continue" to advance to the next page
 3. Input data from the Form 1040 for each household member and select "Save"
 4. Repeat Step 3 above for each household member until all data has been entered for each household member
 5. Select "Calculate" to advance to the next page
- xviii. Note the "Total Annual Income" amount and record this to the applicant's record in the Preparing for Acquisition tab under AMI Status section.
- xix. Note the LMI threshold for the household size and record this to the applicant's record in the Preparing for Acquisition tab under AMI Status section.
- xx. Note whether the household income is "above" or "below" the income limit for this location and record this to the applicant's record using the following steps
 1. Open up QuickBase (Chrome is the recommended browser).
 2. Navigate to the file you want to update.
 3. Select the pencil icon from the three icons in the first column.
 4. Using the arrows on the upper left of the case record navigate to and select the "Intake" tab
 5. Navigate to the "Eligibility" section

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6. Navigate to and select the appropriate “LMI” option from the dropdown on the right of that field.
 - a. If the HUD calculator reported the household is “above” the income limit, select “No” from the dropdown
 - b. If the HUD calculator reported the household is “below” the income limit, select “Yes” from the dropdown
 7. Once the record has been updated, select “Save” to save and exit the current screen.
- xxi. Return to the HUD Calculator and at the top of the page, select “Export to PDF” and save this file to your computer using the naming convention of “[YYYY].[MM].[DD].[APPLICANT’S LAST NAME] INCOME CALC”
1. Upload to the applicant’s record in the System of Record
4. Determining Preliminary CDBG-DR Eligibility
- a. Open up QuickBase (Chrome is the recommended browser).
 - b. Navigate to the file you want to update.
 - c. Select the pencil icon from the three icons in the first column.
 - d. Using the arrows on the upper left of the case record navigate to and select the “Preparing for Acquisition” tab
 - e. Navigate to the “Eligibility” section
 - f. Navigate to and select the appropriate “AMI Status” option from the dropdown on the right of that field.
 - g. If the LMI field in the Eligibility section reflects “No”, the application is eligible for HMGP assistance only; they are ineligible for CDBG-DR assistance.
 - i. Case Managers will complete the [“VHBP - HMGP Only Preliminary Eligibility Determination.docx”](#) letter which should include appeals materials.
 1. Send the “HMGP Only Preliminary Eligibility Determination” letter to the applicant, via email,
 2. Record the date the Notice and Form was sent to the system of record,
 - h. If the LMI field in the Eligibility section reflects “Yes”, the application is eligible for HMGP and CDBG-DR assistance, Case Managers will provide the following:
 - i. Case Managers will complete the [“VHBP - Dual Funding Preliminary Eligibility Determination.docx”](#) letter which should include appeals materials.
 1. Send the “HMGP Only Preliminary Eligibility Determination” letter to the applicant, via email,

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2. Record the date the Notice and Form was sent to the system of record,
 - ii. **Required Document Checklist:** Case Managers must provide the checklist to eligible applicants to participate in the VHBP and demonstrate eligibility for CDBG-DR funds.
 1. [VHBP Required Document Checklist.docx](#)
 - iii. **Stop Construction Notice and Disclosure of Information on Lead-Based Paint and-or Lead-Based Paint Hazards:**
 1. [VHBP Stop Construction.docx](#)
 2. [Disclosure of Information on Lead-Based Paint and-or Lead-Based Paint Hazards.pdf](#)
 - iv. Case Managers must provide these forms and record the date sent and the date confirmation of receipt is received:
 1. Send the Stop Construction Notice and the Lead Based Paint Disclosure form to the applicant, via email, if they are determined to be LMI,
 2. Record the date the Notice and Form was sent to the system of record,
 3. Record confirmation from the household that the Notice and Form were received.
 4. Recording the date sent
 5. Recording the date received
5. Cohort Assignment & Verification
 - a. Based on household income and other prioritization factors, listed below, Case Managers will assign a Cohort to applicants
 - i. Prioritization Factors
 1. Qualification for CDBG-DR
 2. Readiness to Relocate
 - ii. Cohorts are listed in section 4.1 – Acquisition Cohorts
 - b. Case Managers will record the Prioritization Factor in the System of Record by following these steps:
 - i. Go to Preparing for Acquisition tab and then to Relocation section
 - ii. Choose option from drop down under urgency of relocation
 - iii. Choose option from drop down under replacement housing plan
 - iv. Choose option from drop down under timing of relocation
 - v. Enter any relevant notes in relocation notes section

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- c. Adjustments to Cohorts will be completed by VHBP leadership on a strictly as-needed basis. **Case Managers are not to edit assigned cohorts under any circumstances.**
6. Cohort Management
- Cohorts will open according to dates set by Escambia County.
- a. **Cohorts Not Yet Ready to Advance**
 - i. Stick to talking points
 - ii. Continue to share and discuss the benefits of the program
 - iii. Maintain applicant engagement protocol for protecting PII, sharing approved updates, and handling escalations, complaints, and withdrawals.

- b. **Cohorts Ready to Advance**
 - i. continue on with following steps.
7. Collect the following documentation and proofs and upload to the homeowner's record:

NOTE: *names of applicants and household members, addresses for the damaged property or alternative mailing sites, and dates, must all match and be consistent with program policy.*

- a. Required Forms
 - i. **Income Certification and Disclosure Form** (verify this has been uploaded into the system of record)
 - ii. Appeals Materials
 - 1. Notice of Rights to Appeal
 - 2. Request for Appeal Form
- b. To be provided upon request:
 - i. [Voluntary Withdrawal Request Form](#) (see "Withdrawal" in Appeals & Withdrawals section for details on withdrawal).
 - ii. [Communications Designee Form](#) (Add case note to communication & documentation section if form is requested and provided back.
- c. Ensure all required documentation is collected and uploaded to the System of Record and follows approved naming conventions.

Prioritized Intake

Once each cohort is opened, properties tagged to the current cohort will move forward and be asked to submit additional information and documentation. Case Managers will request the following forms from all CDBG-DR eligible homeowners and household members.

- a. Additional Forms

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- i. Proof of Primary Residency (1. Utility bill, 2. Tax return [could be same as 1040], 3. Credit Card Statement)
 - ii. Same Name Affidavit
 - iii. Proof Property is a Rental (if rental; lease)
 - iv. [Insurance Cert and Disclosure](#)
 - v. [Certification of Zero Income](#)
 - vi. [Emergency Repair Form](#)
 - vii. [Same Name Affidavit](#)
 - viii. Communication Designee/ Power of Attorney (POA) – as-needed
 - ix. Subsidized Load Affidavit
 - x. Appeals Materials
 1. Notice of Rights to Appeal
 2. Request for Appeal Form
 3. Receipt of Appeal Form
 4. Appeal Determination Form
- b. Proofs
- xi. Identity
 - xii. Qualified Citizenship Status
 - xiii. Ownership (comes through title work)
 - xiv. Proof of Heirship (comes through title work)
 - xv. Income (1. 1040, 2. Paystubs, 3. Zero income form)
 - xvi. Property Tax Status (comes through title work)
 - xvii. Mortgage Status (DOB/ VOB)
 - xviii. SBA Loan Status (SOR data-feed)
 - xix. FEMA Award (SOR data-feed)
 - xx. Proof of Insurance at Time of Storm (1. Proof, 2. No-insurance form)
 - xxi. Proof of Current Insurance (1. Proof, 2. No-insurance form)
 - xxii. Proof of Disaster Assistance Received (via form)

Intake QC

Quality Control checks of intake materials ensure data and materials entered into the system of record for purposes of processing files are complete and accurate, and consistent with VHBP requirements.

1. Application Review and Verification
 - a. The case manager will review all submitted documentation for completeness and verify the information provided. This includes confirming that all required documents are included and that they meet the program's criteria.
2. QA/ QC Checkpoint – ICF Only

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- a. Case Manager will task the Project Coordinator/ CDBG-DR Lead with QA/ QC of the file by email.
- b. Project Coordinator/ CDBG-DR Lead will QA/ QC the file.
- c. If the review **passes**
 - i. Project Coordinator/ CDBG-DR Lead will
 1. Notify the Case Manager the file is ready for further processing by email.
- d. If the review **fails**
 - i. Project Coordinator/ CDBG-DR Lead will
 1. Indicate the file fails by sending CM an email and include notes on deficiencies and needed corrective actions
 - ii. Case Manager will
 1. Follow QC notes and make revisions or updates to the file
 2. Resubmit once revisions or updates are complete and resubmit

Eligibility & DOB/ VOB

Eligibility reviews are intended to establish household income for property owners so the County may prioritize LMI households and determine if households are able to move forward with CDBG-DR award determinations. Once CDBG-DR eligibility is established, VHBP staff will complete duplication of benefits analyses to determine what, if any, funds may be duplicative of an award.

1. Eligibility Reviews
 - a. Conduct eligibility reviews based on the collected documentation and predefined criteria.
 - b. Verify income, document any duplication of benefits, and determine relocation incentive eligibility and amounts.
 - i. Case Managers will follow the steps below to conduct eligibility reviews:
 1. Property owned at time of storm
 - a. Review the title report in the applicant's record.
 - b. The applicant must have owned the property no later than September 16, 2020.
 - c. If the property **was** owned at the time of the storm by the current homeowner
 - i. Navigate to the "Preparing for Acquisition" tab.
 - ii. Navigate to the "Eligibility" Section.

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1. Send the "HMGP Only Preliminary Eligibility Determination" letter to the applicant, via email,
 2. Record the date the Notice and Form was sent to the system of record,
 - d. If the household **is** LMI
 - i. Continue on to the following steps.
 4. Property occupied
 - a. Review the proof(s) of primary residency in the applicant's record.
 - b. If the property **is** occupied
 - i. Navigate to the "Preparing for Acquisition" tab.
 - ii. Navigate to the "Eligibility" Section.
 - iii. Navigate to "Occupied" and select "Yes" from the dropdown on the right side of the field.
 - c. If the property **is NOT** occupied
 - i. Navigate to the "Preparing for Acquisition" tab.
 - ii. Navigate to the "Eligibility" Section.
 - iii. Navigate to "Occupied" and select "No" from the dropdown on the right side of the field.
 5. Property rented (has a tenant)
 - a. The Case Manager should ask the applicant if they have a tenant in the property
NOTE: *The Case Manager should remind the applicant that having a tenant does NOT make their household ineligible for CDBG-DR assistance.*
 - b. If the property **does** have a tenant
 - i. Navigate to the "Preparing for Acquisition" tab.
 - ii. Navigate to the "Eligibility" Section.
 - iii. Navigate to "Rented" and select "Yes" from the dropdown on the right side of the field.
 - iv. Navigate to "Tenants Present" and select "Yes".
 - c. Request proof of rental (e.g., lease) and follow the directions listed in "3.3.2.4 - Uploading Documents" to upload to the applicant's record.
 - d. If the property **does NOT** have a tenant
 - i. Navigate to the "Preparing for Acquisition" tab.
 - ii. Navigate to the "Eligibility" Section.

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- iii. Navigate to "Rented" and select "No" from the dropdown on the right side of the field.
 - iv. Navigate to "Tenants Present" and select "No".
2. Duplication of Benefits (DOB)
 - a. Calculate DOB in accordance with the Stafford Act.
 - b. Leverage prior DOB reviews completed by the County.
 - c. Determine any DOBs for each household.
3. QA/ QC Checkpoint – ICF Only
 - a. Case Manager will task the Project Coordinator/ CDBG-DR Lead with QA/ QC of the file by email.
 - b. Project Coordinator/ CDBG-DR Lead will QA/QC the file.
 - c. If the review **passes**
 - i. Project Coordinator/ CDBG-DR Lead will
 1. Notify the Case Manager the file is ready for further processing by email.
 - d. If the review **fails**
 - i. Project Coordinator/ CDBG-DR Lead will
 1. Indicate the file fails by sending CM an email and include notes on deficiencies and needed corrective actions
 - ii. Case Manager will
 1. Follow QC notes and make revisions or updates to the file
 2. Resubmit once revisions or updates are complete and resubmit

Inspections

Inspections are needed to identify property conditions and eligibility of the land, and to establish if hazards exist which must be accounted for during demolition and restoration of the land.

1. Scheduling Inspections
 - a. Once eligibility is confirmed, the case manager will schedule property inspections to assess the condition of the property and determine the buyout amount. This step is crucial for establishing the property's value and ensuring compliance with program standards.

Award Calculation

Award calculation for CDBG-DR eligible applicants includes the determination of an award amount for not only the same of the property, and completion of appropriate CDBG-DR forms to accompany the transaction, but also determination of the incentive amount.

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1. Award Calculation and Notification
 - a. The case manager will calculate the award amount based on the inspection results and program guidelines. After the award amount is determined, the applicant will be notified, and any questions or concerns can be addressed.
 - b. The award will identify:
 - i. County offer amount based on current fair market value of single appraisal or, if two (2) appraisals were done, the average of the two.
2. Drafting Purchase Offer Letter
 - a. Drafting Purchase Offer Letters
 - i. Use standardized templates to draft purchase offers.
 1. Download and save a copy of the "VHBP Purchase Offer Letter" template
 2. Add in all necessary information for
 - a. current date
 - b. homeowners' names
 - c. mailing address
 - d. damaged property address
 3. Open up grantTRAX to verify offer amount:
 - a. Navigate to the appropriate property file
 - b. Navigate to "Intake" tab
 - c. Navigate to "Appraisal History" section
 - d. Identify the "Appraisal Value (Avg.)"
 - e. Record the appraisal value to the "VHBP Purchase Offer Letter" in both sections – on page 1, and page 2
 4. Verify if homeowners are eligible for CBDG-DR incentives
 - a. Navigate to the appropriate property file
 - b. Navigate to the "Preparing for Acquisition" tab
 - c. Navigate to the "Eligibility" section
 - d. Navigate to "AMI Status"
 - e. Identify the LMI status (will appear as "no" or "yes")
 - i. If "Yes"
 1. On the "VHBP Purchase Offer Letter" select "ARE" in the incentive section
 2. In grantTRAX record the "Replacement Housing Cost Maximum"
 - ii. If "No"

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1. On the "VHBP Purchase Offer Letter" select "ARE NOT" in the incentive section
 2. Record "N/A" in the "Replacement Housing Cost" field of the "VHBP Purchase Offer Letter"
5. Save a copy of the "VHBP Purchase Offer Letter" using standard naming conventions and upload to grantTRAX
 - a. Navigate to the "Making an Offer" tab and follow the standard document upload procedures.
6. Identify and download the necessary "VHBP Offer Packet" Materials
 - a. Title Report
 - b. Boundary Survey
 - c. Appraisal (if two, include both)
 - d. Appeal Procedures
3. QA/ QC Checkpoint – ICF and Escambia County
 - a. Case Manager will collect all necessary VHBP Offer Packet Materials:
 - i. VHBP Purchase Offer Letter
 - ii. Appeal Procedures
 - b. Case Manager will upload offer letter to grantTRAX under making an offer tab in the statement of determination and compensation section under upload related document. t Project Coordinator/ CDBG-DR Lead receive a notification from grantTRAX that an offer letter is ready for review. Project Coordinator/ CDBG-DR Lead will QA/QC the file.
 - c. If the primary review **passes**
 - i. Project Coordinator/ CDBG-DR Lead will
 1. Indicate the file **passes** by putting in date offer letter review completed
 2. Notify the County POC by sending email to County POC with offer letters for review and mailout.
 - d. If the primary review **fails**
 - i. Project Coordinator/ CDBG-DR Lead will
 1. Indicate the file **fails** by leaving the offer letter review completed date blank and include notes on deficiencies and needed revisions or updates

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2. Notify the Case Manager as the file requires additional review by email and include notes on deficiencies and needed revisions or updates.
- ii. Case Manager will
 1. Follow QC notes and make revisions or updates to the file
 2. Re-upload offer letter once revisions or updates are complete,
- e. If the secondary review **passes**
 - i. County POC will
 1. Indicate the file **passes** by putting in county offer letter review completed date in grantTRAX.
 2. Send the VHBP Purchase Offer Packet to County Legal for Review
 - ii. Case Manager will coordinate with County staff on any requested revisions to the VHBP Purchase Offer Packet
 1. Case Manager will record this information to grantTRAX
 - a. Navigate to the appropriate property file
 - b. Navigate to "Making Offer" tab
 - c. Navigate to "Contracting, Drafting, and Legal Review" section
 - d. Select the appropriate "Date Sent to Contracting and Legal Review" and add any important notes
 - e. Select the appropriate "Date Contracting and Legal Review Complete" and add any important notes
 - f. Select the appropriate "Date Sent to Commissioners" and add any important notes
 - ii. County POC will coordinate with BOCC to schedule agenda item to review and approve offer
 1. County POC will notify Case Manager of:
 - a. Date BOCC meeting occurred and
 - b. BOCC determination
 2. Case Manager will:
 - a. Navigate to the appropriate property file
 - b. Navigate to "Making Offer" tab
 - c. Navigate to "County Commission Meetings" section
 - d. Select the appropriate "Date Meeting Occurred" and add any important notes

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- e. Select the appropriate "Meeting Outcome" and add any important notes
 - f. Add important notes to the "County Commission Comments"
 - g. Upload approved "VHBP Purchase Offer Letter" using standard naming convention.
- f. If the secondary review **fails**
- i. County POC will
 1. Indicate the file **fails** by leaving County Offer Letter Review date blank.
 2. Notify the Case Manager the file requires additional review by email and includes notes on deficiencies and needed revisions or updates.
 - ii. Case Manager will
 1. Follow QC notes and make revisions or updates to the file
 2. Resubmit once revisions or updates are complete and resubmit

Making an Offer

Creating and presenting an offer must be closely coordinated with Escambia County staff working with the VHBP program to ensure close alignment between VHBP policies and procedures and existing County ones. Any questions or concerns should be immediately raised to the VHBP Program Manager.

1. County POC mails VHBP Offer Letter Packet and notifies Case Manager
2. Case Manager will:
 - a. Record the date of transmittal in grantTRAX
 - i. Navigate to the appropriate property file
 - ii. Navigate to "Making an Offer" tab
 - iii. Navigate to "Statement of Determination and Compensation" section
 - iv. Select the appropriate "Date for the County Offer Letter Review Completed" and add any important notes
 - v. Select the appropriate "Date Offer Letter Sent"
 - b. Follow-up with homeowner via their preferred method of communication to:
 - i. Verify the VHBP Purchase Offer Packet has been received
 - ii. Answer any questions, and
 - iii. Ask if the homeowner wishes to schedule a consultation meeting to review the offer packet.
 - c. Follow-up weekly:

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- i. to engage with homeowner on VHBP Offer Packet and answer questions
 - ii. encourage the homeowner to provide a written response to a VHBP program representative within 30 calendar days
 1. Verbal acceptance of the offer will not meet County requirements and homeowners must submit a written acceptance
3. If accepted
 - a. Case Manager will
 - i. Upload the acceptance documentation from the homeowner using standard naming conventions.
 - ii. Notify County POC to begin drafting closing materials
 - b. Complete and submit Draw Request Coversheet
4. If rejected
 - Case Manager will coordinate to schedule a consultation between County staff and the homeowner to discuss
5. If appealed
 - a. Case Manager will
 - i. Record the homeowner's rejection and request to appeal
 - ii. Reiterate the need for a third-party appraisal as part of the appeal process
 - iii. Reiterate the timeline for submitting a third-party appraisal as part of their appeal
 - b. *For full appeals process, see Appeals in Appeals and Withdrawals tab.*
6. If no-response
 - a. Follow-up weekly:
 - i. to engage with homeowner on VHBP Offer Packet and answer questions
 - ii. As necessary, begin administrative withdrawal process

Closing

The closing, or sale, of the applicant's damaged property builds upon existing VHBP policies and procedures. Close coordination with Escambia County staff supporting the VHBP is critical.

1. Case Manager will draft grant closing materials and send them to Project Coordinator for QC. These materials include:
 - a. VHBP Subrogation Agreement

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- i. Case Manager will, on Page 2,
 1. Input the Offer to Purchase amount in the cell adjacent to "Offer to Purchase"
 2. Input the incentive amount, if awarded, or enter zero ("0") in the cell adjacent to "Housing Replacement Assistance (Incentive)"
 3. Input the Duplication of Benefits Amount for buyout or incentives, if any, or enter zero ("0") in the cell adjacent to "Duplication of Benefits Amount"
 4. In the cell adjacent to "Final Award Amount",
 - a. Calculate and input the Offer to Purchase Amount, less and buyout DOB in the first amount section, below "Between"
 - b. Calculate and input the combined sum of the Offer to Purchase Amount and the Housing Replacement Assistance (incentive), less any DOB for buyout or incentive in the last amount section, below "And".
 - c. If there is no incentive or DOB, simply enter the Initial Offer to Purchase amount in both amount sections of this cell.
- b. VHBP Incentive Award (if applicable)
 - i. Case Manager will in order of fields from top to bottom on Page 1,
 1. Input the damaged property address
 2. Enter the date of sale, if property already sold, or leave blank if property proceeding to closing
 3. Input the name of all homeowners
 4. Input the new property address
- c. Contract for Sale
 1. Add in all necessary information for
 - a. damaged property address
 2. Open up grantTRAX to verify offer amount:
 - a. Navigate to the appropriate property file
 - b. Navigate to "Intake" tab
 - c. Navigate to "Appraisal History" section
 - d. Identify the "Appraisal Value (Avg.)"
 - e. Record the appraisal value to the first \$ field in Section 28
 3. Verify if homeowners are eligible for CBDG-DR incentives

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- a. Navigate to the appropriate property file
- b. Navigate to the "Preparing for Acquisition" tab
- c. Navigate to the "Eligibility" section
- d. Navigate to "AMI Status"
- e. Identify the LMI status (will appear as "no" or "yes")
 - i. If "Yes"
 1. On the "VHBP Purchase Offer Letter" select "ARE" in the incentive section
 2. In grantTRAX record the "Replacement Housing Cost Maximum"
 - ii. If "No"
 1. On the "VHBP Purchase Offer Letter" select "ARE NOT" in the incentive section
 2. Record "N/A" in the "Replacement Housing Cost" field of the "VHBP Purchase Offer Letter"
- a. Once reviewed and approved, Project Coordinator will email County Real Estate Director and include the following:
- d. Including the subject line of "[Property address] VHBP Closing Docs"
- e. copy critical staff on the email:
 - i. County Program Manager
 - ii. County Grant Manager
 - iii. ICF Project Manager
- f. Including in the email the:
 - i. Title of FEMA-State/Tribe Agreement or the FEMA Grant Agreement if not the FSA/FTA
 - ii. Date of the FEMA agreement
 - iii. Title of Agreement
 - iv. Date of appropriate sub agreement:
 1. Sagebrush Project/Grant: 4/20/2023
 2. Bristol Park Project/Grant: 2/6/2023
 3. County Wide (Sally) Project/Grant: 4/6/2023
 4. Floodplain Property Acquisitions (COVID) Project/Grant: 5/14/2023
- b. County Real Estate POC will coordinate completion of VHBP closing documents with Escambia County Attorneys and scheduling of agenda for BoCC review and approval of purchase materials

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- c. Closing Process
- g. Schedule closing dates with all parties involved.
- h. Ensure all necessary documents are prepared and signed.
 - i. Seller's Affidavit
 - ii. Settlement Statement
 - iii. Contract for Sale and Purchase
 - iv. Release of Mortgage/ Non-mortgage Seller or Refinance Payoff
 - v. Warranty Deed to the County
- i. Conduct the closing, ensuring all documents are signed and funds are transferred.
- j. Document the completion of the closing process.
- k. Record all document with County Clerk and Recorded.
- l. Uploaded recorded documents to SOR.

Final Disposition

Consistent with Policy Section 46-139 "Acquisition of Real Property by the County", once documents of sale are mutually executed by the seller and Escambia County, and filed with the County Clerk, the VHBP Program Manager will notify Escambia County Public works, via email, of the property acquisition and conditions of sale (e.g., ongoing maintenance responsibility and limitations on redevelopment).

Use of properties acquired through the VHBP will be consistent with the warranty deed for each property (complies with 24 CFR 570.201(b) and 24 CFR 570.505), filed with the County Clerk upon closing, and restricting development and use of the land. Properties acquired by Escambia County through the VHBP will be administered consistent with Escambia County policy for land and open space management (14-37 "Property Maintenance"); annual updates will be tracked through the County's pre-existing maintenance reports process.

Recapture

Recapture ensures that program funds, such as incentive awards, are used consistent with established VHBP policies.

- 1. Post-Closing Follow-Up
 - a. The case manager will conduct follow-up activities to ensure compliance with program requirements and address any issues that may arise after closing. This includes monitoring for potential recapture events and assisting the applicant with any post-closing needs.

Closeout

Closeout for VHBP files helps prepare them for grant closeout and long-term document retention, consistent with County and HUD policies.

1. Case Closure
 - a. Perform grant closeout activities at the project's conclusion.
 - b. Draft official closeout letters.
2. QA/ QC Checkpoint – ICF and Escambia County
 - a. Case Manager will task the Project Coordinator/ CDBG-DR Lead with QA/ QC of the file by [tasking action]
 - b. Project Coordinator/ CDBG-DR Lead will QA/QC the file.
 - c. If the primary review **passes**
 - i. Project Coordinator/ CDBG-DR Lead will
 1. Indicate the file **passes** in the system of record
 2. Notify the County POC via email
 - d. If the secondary review **passes**
 - i. County POC will
 1. Indicate the file **passes** in the system of record
 2. Notify the Case Manager the file is ready for further processing via email
 - e. If the secondary review **fails**
 - i. County POC will
 1. Indicate the file **fails** in the system of record and include notes on deficiencies and needed revisions or updates
 2. Notify the Case Manager the file requires additional review via email
 - ii. Case Manager will
 1. Follow QC notes and make revisions or updates to the file
 2. Resubmit once revisions or updates are complete and resubmit
 - f. If the primary review **fails**
 - i. Project Coordinator/ CDBG-DR Lead will
 1. Indicate the file **fails** in the system of record and include notes on deficiencies and needed revisions or updates
 2. Notify the Case Manager the file requires additional review via email
 - ii. Case Manager will
 1. Follow QC notes and make revisions or updates to the file
 2. Resubmit once revisions or updates are complete and resubmit

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3. Coordinate the final inspection with Florida Commerce for the CDBG-DR grant.
4. Submit the final reimbursement request.
5. QA/ QC Checkpoint – ICF and Escambia County
 - a. Project Coordinator prepares the reimbursement request and submits to County POC via email
 - b. County POC reviews the reimbursement request
 - c. If the review **passes**
 - i. County POC will
 1. Indicate the file **passes** in the system of record
 2. Submit the reimbursement request to the Florida Commerce for final review and approval by [submission action]
 - d. If the review **fails**
 - i. County POC will
 1. Indicate the file **fails** in the system of record and include notes on deficiencies and needed revisions or updates
 2. Notify the Project Coordinator the file requires additional review via email
 - ii. [ICF Staff Member] will
 1. Follow QC notes and make revisions or updates to the file
 2. Resubmit once revisions or updates are complete and resubmit

Complaints and Grievances, Appeals, and Exceptions

Complaints and grievances must be tracked and cataloged, regardless of how they are presented to the program, to ensure applicants are receiving fair treatment from the VHBP.

Appeals are the right of every applicant and may be made in response to any program determination. Policies cannot be appealed.

Exceptions could occur in instances an applicant or the VHBP feel the most appropriate action is not one already allowed by VHBP policies and procedures.

Complaints and Grievances

1. Complaints and grievances about the program should be logged in grantTRAX under the communication and documents tab under Complaint Log and notification sent via email to the Program Manager within 24 hours of receipt of the complaint.
2. Complaints and grievances may be received via email or transmitted verbally to any program staff member.

Appeals

Appeal cases and documents should be logged in grantTRAX under the Appeals and Withdrawal section

Appeal submitted by an applicant or tenant will be reviewed by the County. A complete appeal submission for applicants in VHBP includes a detailed letter of the issue and the Request for Appeal Form; the applicant may also include supporting documentation. A tenant filing a URA appeal only needs to submit, at a minimum, a written statement. All forms and documentation do not need to be submitted at the same time.

The Case Manager may reach out to the applicant or tenant to request additional documents or information; then, after review, will render an appeal determination. Information from third-party entities may be requested including, but not limited to, inspection report(s), amount of assistance received, and future assistance to be received. An appeal will be reviewed when all information and documentation requested by the program have been received or is deemed not attainable. In most cases, the program will issue an appeal determination to the applicant within sixty (60) calendar days of receiving a completed appeal package. Some appeals will require up to one hundred and twenty (120) days to review due to in-depth documentation. The program will provide an update on the progress during the review if a longer time is needed.

Appeal Determination

The Appeal Determination Letter will provide the program's decision with an explanation for the basis of that decision. The appeal determination is considered final. An applicant will receive an appeal consultation with their Case Manager for further assistance.

Extension Request

An applicant may request additional time to submit their complete appeal by submitting an Extension Request Form. This form will be accepted by the program only after the Request for Appeal Form has been submitted for VHBP appeals. All Extension Request Forms should be submitted within thirty (30) calendar days of the date of the determination letter being appealed. An extension will extend the complete appeal package submission deadline by thirty (30) calendar days. Applicants can request an extension for their appeal two (2) times.

Extension Request for an Appeal Regarding Relocation

A tenant may request additional time to submit their complete appeal by submitting an Extension Request Form. All extension request forms should be submitted within sixty (60) calendar days of the determination letter being appealed. An extension will extend the complete appeal package submission deadline by thirty (30) calendar days. Tenants can request an extension for their appeal two (2) times.

Applicant Withdrawal of Appeal

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Applicants and tenants may voluntarily withdraw their appeal request at any time prior to a final appeal determination being sent. The applicant or tenant will be required to submit a signed letter via email or mail stating that they would like to withdraw their appeal. If an applicant or tenant chooses to withdraw the appeal submission, their status in the program will remain as it was prior to the appeal submission.

Questions about Appeals

If you have any questions or concerns, please email your Case Manager for additional information.

Applicants may submit a written appeal related to any determination made by VHBP that affects the applicant's eligibility or assistance. An appeal will not be considered if an applicant is appealing a Federal Regulation or resultant program policy (see Policy Manual and HUD regulations).

Appealable program determinations include the following:

- Preliminary income eligibility (eligibility for CDBG-DR)
- Voluntary withdrawal
- Administrative withdrawal
- Purchase offer
- Determination of ineligibility
- Incentive determination

Appeal Acknowledgement and Selections Form: Upon determination of an appeal request, applicants will receive an Appeal Determination Notification and an Acknowledgement and Selection form. Applicants that choose to reject the appeal determination are notified that they are choosing to end their participation in the VHBP program and will be withdrawn.

Exceptions

Exceptions to existing policies or procedure will be considered on a case by case basis, at the request of the applicant and discretion of the program. Any granted exception will be noted in the project file and documented with a memo to file.

Withdrawals

Withdrawals are points at which applicants may decide to exit the program or be moved out of the program due to established conditions. As the VHBP is 100% voluntary, applicants may choose to withdraw at any time up to the point of executing their closing documents.

Voluntary

An applicant may elect to voluntarily withdraw from the program at any time. All requests to withdraw an application must be submitted in writing or by electronic means.

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Voluntarily withdrawing from the program does not preclude the applicant from re-entering the program while it is open and accepting applications but is subject to review and approval.

Applicants will be informed that to re-enter the program; they must submit a written request for reinstatement.

The Program will send a voluntary withdrawal acknowledgement to the applicant.

Note: Applicants may be subject to recapture if they withdraw after signing a grant agreement.

Administrative

Applicants have responsibilities to participate in the program, including responding to requests for information, being available for property inspections, and completing required documentation. An applicant may be administratively withdrawn from the program at any time if they become non-responsive or fail to provide required information or documentation to the program. In addition, abusive behavior (including physical intimidation) is not tolerated and is similarly grounds for an administrative withdrawal from the program.

Fraud, Waste, and Abuse

As a steward of public funds, Escambia County is actively working to combat fraud, waste and abuse (FWA) in its programs. This SOP provides procedures for program staff to detect and report fraud, waste, and abuse when operating VHBP. Procedures that enable fraud prevention are included throughout existing Standard Operating Procedures for the program.

Detecting FWA

In recovery programs, common sources of FWA include an applicant's application or supporting materials and a contractor's invoicing or change orders. Less common, but possible additional sources of FWA include actions of public officials, program staff, and subrecipients. Examples of FWA are included for reference below:

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Fraud	Waste	Abuse
<p>misrepresentation of:</p> <ul style="list-style-type: none"> • Income (Unreported or under-reported) • Household composition • Financial resources (transferred or hidden resources) <p>Other types of fraud include, but are not limited to:</p> <ul style="list-style-type: none"> • Using another person's identification • Forging signatures or documents • Concealing access to duplicate funding • Misrepresenting a medical condition to obtain additional benefit • Misusing funds (diverting them for an unintended use) 	<ul style="list-style-type: none"> • Purchase of unneeded supplies or equipment • Purchase of goods at inflated prices • Failure to reuse major resources or reduce waste generation 	<ul style="list-style-type: none"> • Any dishonest or fraudulent act • Misappropriation of funds, supplies or assets • Impropriety in reporting money or financial transactions • Profiting as a result of insider knowledge • Unauthorized disclosure of confidential or private information • Accepting or seeking anything of value from any person that seeks a beneficial decision, contract, or action. • Unnecessary cost or expenditures • Diversion of program resources

Common methods to detect FWA include, but are not limited to:

- Ensuring all invoices are from verified firms, are not duplicates, contain true and necessary purchases, and align with contracts.
- Comparing application materials against third party sources to verify information and confirm entries.
- Inspecting work to confirm alignment with invoices, change orders, and attestations from program participants.

Threshold for FWA Reporting

There is an important distinction between FWA and honest mistakes and misunderstandings. Especially in cases where applicants have provided incorrect information, program staff should use good judgment in determining whether the action rises to the level of FWA. Simply forgetting to include a household member on an application or missing a minor source of income does not rise to the level of FWA in most circumstances. Program staff should work with their management to identify appropriate

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thresholds for when to request clarification from applicants, contractors, and program staff due to an honest mistake or misunderstanding and when to report FWA.

Any employee, Escambia County consultant or subrecipient who has knowledge of FWA, or who has good reason to suspect that such conduct has occurred is required to report their concerns. Program staff are always entitled to submit FWA reports, regardless of the opinion of management, if they feel it is appropriate.

Reporting FWA

Reporting FWA is the responsibility of all VHBP staff. Anyone who has identified or suspects FWA should report it immediately.

Reporting Procedures

1. The person who has identified the suspected FWA (FWA Detector) will use all immediately available sources of information to confirm the suspected FWA, if possible.
 - a. This ensures that the suspected FWA is not a mistake by the FWA Detector or a misunderstanding of the materials being reviewed.
2. The FWA Detector will consult with their manager to confirm it is not an honest mistake or misunderstanding and constitutes FWA that requires reporting and investigation.
 - a. If the FWA Detector suspects that program staff (employees, contractors, or subrecipients) may be involved in the suspected FWA and consulting management may be inappropriate, the FWA Detector should either
 - i. Consult another member of management that may be more appropriate, or
 - ii. Skip this step and immediately report the suspected FWA without consulting management.
 - b. To protect personal safety and privacy and to preserve the integrity of the investigation, the FWA Detector:
 - i. Should not contact the employee or other individual who has been reported for any purpose (including efforts to gather additional information or demand restitution) except for normal job duties; and
 - ii. Should not destroy, or allow to be destroyed, any document or record of any kind that the employee knows may be relevant to a past, present or future investigation.
 - iii. Should not discuss the report with anyone other than the personnel assigned to the inquiry.

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4. If the FWA Detector is an employee of ICF, subrecipient or other Escambia County partner, their management will notify Escambia County of the reported FWA either immediately or in weekly reports provided to Escambia County staff.

5. Escambia County staff will investigate the reported FWA. Escambia County staff will forward all substantiated cases of fraud, waste, or abuse of government funds to the United States Department of Housing and Urban Development (HUD), Office of Inspector General (OIG).

Any program staff acting in good faith in reporting detected or suspected fraud, waste, or abuse will not be subject to any reprisals, retaliation, threats, coercion, or similar acts for having disclosed such activities