



Zeta Roof Program

Implementation Guidebook

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1 Introduction

This document serves as the program guidelines for the State of Mississippi's disaster recovery roof repair program known as the Roof Retrofit and Repair Program (RR&R), which is also referred to as the "Zeta Roof Program" (ZRP) or the "Program." These guidelines were developed to serve as a basis for the ZRP and to provide guidance on program implementation that follows HUD standards and best practices. This document may also serve as a reference for property owners, applicants, and other interested parties who want to understand how the program operates. Note that these program guidelines are specifically intended to address the ZRP only.

On February 3, 2022, the U.S. Department of Housing and Urban Development (HUD) allocated \$28,470,000 of Community Development Block Grant Disaster Recovery (CDBG-DR) funds to the State of Mississippi. This allocation is aimed at supporting long-term recovery initiatives following Hurricane Zeta.

Harrison County was designated by HUD as the "Most Impacted and Distressed" (MID) area based on the analysis of FEMA claims data related to the hurricane. As such, the Mississippi Development Authority Disaster Recovery Division (MDA-DRD) has designated a portion of the allocated funds for the repair/replacement of Hurricane Zeta-damaged roofs in Harrison County.

2 Program Overview

The ZRP provides funding to eligible single-family owner/occupant applicants and community service organizations in Harrison County to repair or replace roofs damaged by Hurricane Zeta (also referred to as "storm") in October 2020.

ZRP was created by MDA-DRD and is administered by Habitat for Humanity of the Mississippi Gulf Coast (HFHMGCC). ZRP serves low-to-moderate (LMI) households impacted by Hurricane Zeta in Harrison County. Applicants who meet the eligibility and other program requirements explained in these program guidelines may be awarded funds to repair or replace their storm-damaged roofs. ZRP funds will not be distributed to homeowners directly but will be distributed to program-selected roofing contractors to pay for the cost of construction activities which have been determined by independent damage estimators.

Eligible activities under this program include roof repairs for single-family homes and community service buildings, provided the damage is directly attributable to Hurricane Zeta. Household eligibility for primary roof repairs within Harrison County is restricted to those households earning no more than 80% of the Area Median Income (AMI). Roof repairs to community services buildings will be made only to those buildings operated by non-profit entities which provide social and educational services to low-to-moderate income individuals and families and vulnerable populations.

Applicants who satisfy the eligibility criteria and other program stipulations outlined in the program guidelines may receive funds for repairing their storm-damaged property in situ. However, ZRP funds will not be directly distributed to homeowners. Instead, the funds will be issued to program-selected roofing contractors to cover the costs of the approved construction activities.

2.1 Purpose and Objective

The primary objective of the ZRP is to aid the most vulnerable and adversely affected households within Harrison County. This objective directly responds to the housing needs identified in MDA-DRD's unmet needs assessment. ZRP's primary objective is specifically tailored to address storm-related roof damage.

Further, the repair/replacement activities will incorporate mitigation measures aimed at making the roofs more resilient to future disasters.

2.2 National Objective

All activities funded through ZRP will meet the HUD National Objective of providing benefit to LMI persons. To ensure that the program is in compliance with HUD's National Objective to LMI persons, 100% of owner/occupant applicant households served by ZRP must qualify as LMI with a total household annual gross income that does not exceed 80% of Area Median Income (AMI), adjusted for family size, as published annually by HUD.

2.3 Eligible Counties

To be eligible, the structure to be assisted must be located in Harrison County.

2.4 Repair Award Cap

The maximum award granted to an applicant for roof repair is \$25,000.

3 Intake Application

Zeta Roof Program (ZRP) applications will be accepted until January 31, 2024. MDA may adjust the intake period at its discretion to accommodate program needs. Only one (1) application per applicant will be considered.

Single-family owner-occupants and community service organizations who are interested in assistance may apply for ZRP via the following methods:

- Call 228-678-9130 to be connected with an attendant program representative to submit an Intake Form.
- Complete an online Intake Form at www.zetarroof.com
- Visit Habitat for Humanity MS Gulf Coast; 8:30 a.m. – 4:30 p.m. Monday thru Friday:

Habitat for Humanity MS Gulf Coast
2214 34th St.
Gulfport, MS 39564

- Additional intake events will be periodically hosted in areas across the county with partner organizations. These events are TBD but will be publicly announced via social media and www.zetarroof.com.

Applicants will be required to complete a ZRP intake application and provide supporting documents required for eligibility review, income verification, and duplication of benefits review. All documentation submitted by the applicant must be valid at the time of submission. The application process will require each applicant to authorize ZRP to obtain 3rd-party data by signing a consent/release form. Intake specialists will collect documents needed to determine eligibility for the program.

Intake specialists will be available at Habitat for Humanity MS Gulf Coast (HFHMGC), by phone, and via email to assist the applicant through the intake process and to answer questions as needed. Each applicant will be assigned a dedicated Intake Specialist who has a direct email and phone line at which he/she can be reached. Applicants are provided direct contact information for the intake specialist assigned to the application. Alternatively, the applicant may contact a program representative by calling 228-678-9100.

Multiple standard methods of communication will be provided to ensure applicants receive timely, accurate information regarding their applications and the program. Methods of communication with the Program representatives include, but are not limited to:

- Zeta Roof Program website: www.ZetaRoof.com
- Email: info@hfhmgc.org
- Telephone at 228-678-9100; and
- Mail correspondence.

3.1 Single-Family-Owner Applicant Identification

All applicants will be required to submit a valid photo identification. Expired photo identification will not be accepted. Forms of identification accepted by ZRP are:

- Government Issued Photo Identification (Federal or State issued);
- Driver's License;
- Passport or visa;
- Military ID Card;
- A firearms license;
- A student photo identification issued by an accredited Mississippi public secondary school, community college, college, or university;
- A tribal photo identification; or
- Certificate of Naturalization or Permanent Resident Card.

Household members under the age of eighteen (18) must also submit proof of age either by birth certificates or other documents which demonstrate the age or date of birth of the minor.

3.2 Required Applicant Certifications

As part of the ZRP application process, each applicant must sign an Acknowledgements and Consent statement. The bulleted items below outline the required authorizations and certifications that each applicant is required to sign.

- Release of Information – Authorization from the applicant to share and receive personal information from third parties in connection with ZRP and for purposes of progressing his/her case through ZRP;
- Right of Entry – Authorization from the applicant for the program to access the damaged property throughout the life of the application;
- Certification of Truthfulness – Applicant affirmation that all information provided in the application is accurate; and
- Subrogation Agreement – Applicant affirmation that any funds received for the same purpose as funds provided under ZRP after provision of assistance through ZRP must be returned to MDA.

3.3 Order of Assistance (Prioritization)

In order to assist the most vulnerable households, ZRP will prioritize review of applicants based on the following factors:

1. Priority 1: Applicants with both:
 - a. Household member(s) age 62 and older AND
 - b. Household member(s) with a documented disability
2. Priority 2: Applicants with either:
 - a. Household member(s) age 62 and older OR
 - b. Household member(s) with a documented disability
3. Priority 3: Applicants with neither:
 - a. Household member(s) age 62 and older OR
 - b. Household member(s) with a documented disability

To be considered as a household with disabled household member(s), a Verification of Disability Form must be completed by the applicant. The Verification of Disability form requires that the applicant document the disability via one of the following acceptable methods:

1. Visible disability such as a wheelchair bound applicant or an applicant utilizing the assistance of a walker can be verified by an ZRP representative;
2. Receipt of Federal Disability Benefits as documented by applicant provided Social Security Disability Benefits letter/documentation or documented by the Veteran's Administration (VA);
3. Certification from medical professional;
4. Presentation of a government issued disability placard; or
5. Mississippi Homestead Exemption which shows the applicant is disabled.

For purposes of assigning priority for age-dependent household member(s), age will be determined at the time of the eligibility determination.

4 Eligibility Requirements

ZRP applicants will be required to provide complete and accurate information regarding their household composition, household income, and other eligibility criteria. Failure to disclose accurate and complete information (including failure to provide necessary documentation) may result in the applicant being deemed ineligible for assistance.

If an Applicant is found to have submitted inaccurate and/or incomplete information in order to appear eligible for ZRP, then they may be required to make full restitution of the CDBG-DR funds expended to the State of Mississippi, including administrative fees, construction costs, and other costs.

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

All applicants to ZRP must demonstrate compliance with all eligibility criteria.

Individual Owner-Applicants applying to ZRP for assistance must meet all of the following criteria:

- The Applicant’s household must qualify as low- to moderate-income, with a combined annual household income equal to or less than 80% of the Area Median Income, adjusted for family size.
- The applicant must have occupied the home as a primary residence at the time of Hurricane Zeta;
- Applicant must currently own the damaged property
- The storm-damaged property must be located within Harrison County, MS;
- The storm-damaged property must have unrepaired roof damage as a result of Hurricane Zeta;
- The storm-damaged property must be a single-family home.

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

The following table includes eligibility criteria for Owner-Applicants, along with documents required to be submitted by the applicant for each criterion. Eligibility criteria that will be independently verified by the program are noted as such.

Eligibility Criteria	Document(s) Required
Must currently own the damaged.	One (1) of the following: <ul style="list-style-type: none"> • Deed • Mortgage statement • Probated will • Court order or judgement granting ownership of the property Other documents may be considered on a case- by case basis
Must have occupied the home as a primary residence at the time of the qualifying storm(s)	<ul style="list-style-type: none"> • Homestead exemption at the storm-damaged property address in 2020, which was the year of the qualifying storm OR 2 of the following: <ul style="list-style-type: none"> • FEMA IA award letter for damaged property address for damages caused by Hurricane Zeta; • SBA Disaster Home Loan award letter for damaged property address for damages caused by Hurricane Zeta; • Driver’s license or state-issued ID card showing the damaged property address; issued prior to the date of the hurricane and expiring after; • Utility bills addressed to applicant at damaged property address showing that services were provided in the month preceding or month of the disaster (must indicate household utility usage during pre-hurricane time period); • Credit card bill or bank statement sent to the applicant at the damaged property address in the month preceding or the month of the disaster; • Insurance documentation indicating primary residence in 2020, such as a homeowner’s endorsement; • Employer’s statements, including pay stubs and similar employment documents (must be dated in the month preceding or month of the disaster)

	<ul style="list-style-type: none"> • Other documents may be considered on a case-by-case basis
Property is located in Harrison County	Verified by the program using storm-damaged property address
Property has unrepaired roof damage from Hurricane Zeta	<p>Verified by the program via a Damage Assessment; OR</p> <p>If it is impossible to verify storm damage via a program damage assessment, the applicant may be required to provide proof of storm damage, which may include:</p> <ul style="list-style-type: none"> • FEMA IA award letter for damaged property address for damages caused by Hurricane Zeta; • SBA Disaster Home Loan award letter for damaged property address for damages caused by Hurricane Zeta; • Insurance claim noting damages at the damaged property address caused by Hurricane Zeta; • Date-stamped, color photos of storm damage at the damaged property address; or <p>Other documents may be considered on a case- by-case basis</p>
Household is low-to-moderate income	<p>Proof of income is required for the applicant and all household members age 18 or older. Proof of income required varies by the type of income and individual earnings. Required documents to demonstrate income for the most common sources of income are as follows:</p> <ul style="list-style-type: none"> • Most recent year tax return <p>OR, if tax return is not available:</p> <ul style="list-style-type: none"> • Wages: Three (3) recent paystubs dated within the past three (3) months, • Retirement/Social Security: <ul style="list-style-type: none"> • Past three (3) Months Bank Statements (Social Security Benefits & Pension only), • Current Social Security Benefits letter (including benefits paid to minors), • Current Pension/Retirement Benefit letter (if applicable), or prior year 1099 form, or • Current Annuity Payment letter (if applicable), or prior year 1099 form; • Self-Employment Income: Most recent tax return (1040 or 1040A), W-2 Forms; and/or Current year profit and loss statement; • Unemployment Benefits: Current benefit letter with gross benefit amount; • Court Ordered Alimony/Spousal Maintenance: Copy of court order documentation; • Taxable Interest and Dividends (including amounts received by, or on behalf of minors);

	<ul style="list-style-type: none">• No Income: Adult household members who do not earn an income will be required to submit a Certification of No Income.
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A Nonprofit Applicant is one which provides services to the public and which is a nonprofit corporation where no part of the assets, income or profit is distributed to or enures to the benefit of its members, directors or officers, per Miss. Code Ann. §79-11-127(z)(Rev. 2006). To qualify for the Program, the Nonprofit Applicant must meet all of the following criteria:

- Be legally formed and registered with the Mississippi Secretary of State's Office;
- Provide social and educational services to the low- to moderate-income individuals and families (that is, those with a combined annual household income equal to or less than 80% of the Area Median Income, adjusted for family size) and vulnerable populations in Harrison County;
- Own a community service building from which such services are being provided located in Harrison County;
- Must have owned that building at the time of Hurricane Zeta; and
- Must have unrepaired roof damage at the building as a result of Hurricane Zeta.

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

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

4.1 Ownership

To qualify for ZRP, applicants must own the damaged property.

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

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

4.1.1. Documents Required

Proof of ownership can be established with the following documents:

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

4.1.2 Trust

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

4.1.3 Title Clearance

Applicants with ownership interest in a property who cannot supply the acceptable ownership documents as outlined in this guideline due to heirship or probate issues may be afforded up to one (1) year from the date of application to clear title defects related to probate and/or heirship and provide the program with an acceptable document to demonstrate ownership. If an applicant cannot sufficiently resolve ownership issues within one (1) year of application submission, the case will be deemed ineligible for failure to sufficiently prove ownership of the storm-damaged property.

4.1.4 Death of Owner-Applicant

If an Owner-Applicant passes away after an ZRP application is submitted, but before construction begins, the Owner-Applicant's heir may be deemed eligible to receive assistance through ZRP if:

- The heir is a household member listed on the application; and
- The heir can demonstrate current ownership of the storm damaged property via one of the accepted methods outlined in this section; and
- The heir meets all other eligibility requirements.

If no eligible household member-heir is identified, the application will be closed. If an Owner-Occupant passes away after program construction has begun, the program will complete construction at the property.

4.2 Primary Residency

ZRP applicants must provide documentation that establishes that they occupied the damaged property as their primary residence as of the dates of the qualifying disaster in October 2020.

4.2.1 Required Documents

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

- Homestead exemption at the storm-damaged property address in 2020, which was the year of the qualifying storm,

OR 2 of the following:

- FEMA IA award letter for damaged property address for damages caused by Hurricane Zeta;
- SBA Disaster Home Loan award letter for damaged property address for damages caused by Hurricane Zeta;

- Driver's license or state-issued ID card showing the damaged property address; issued prior to the date of the hurricane(s) and expiring after;
- Utility bills addressed to applicant at damaged property address showing that services were provided in the month preceding or month of the disaster (must indicate household utility usage during pre-hurricanes time period);
- Credit card bill or bank statement sent to the applicant at the damaged property address in the month preceding or the month of the disaster;
- Insurance documentation indicating primary residence in the year 2020, such as a homeowner's endorsement;
- Employer's statements, including pay stubs and similar employment documents dated in the month preceding or month of the disaster
- Other documents may be considered on a case-by-case basis

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

4.3 Property Location

To be eligible, the single-family home or community organization building must be located in Harrison County. The program will verify the property location using the property address and GIS coordinates/mapping if needed.

4.4 Property has Unrepaired Storm Damage

To be eligible for assistance, the subject property must have unrepaired roof damage resulting from Hurricane Zeta. The program will attempt to verify storm damage via a property damage assessment. In the event a damage assessment cannot demonstrate storm-related roof damage, the applicant is required to submit sufficient documentation to demonstrate the property sustained roof damage as a result of Hurricane Zeta.

4.5 Eligible Structure Type

To be eligible for ZRP assistance, the property must be a single-family stick-built home or community service building.

4.5.1 Ineligible Structures

The following structure types are ineligible for ZRP assistance:

- Garages, sheds, and outbuildings not attached to the main dwelling unit are not eligible for repair. Improvements must be permanently attached to the main housing structure;
- Recreational Vehicles and camper trailers used as a residence are not eligible for the program;
- Houseboats used as a residence are not eligible for the program;

- Mobile homes;
- Second homes;
- Housing units located where federal assistance is not permitted by federal regulation, including floodways, or within a Coastal Barrier Resources System unit.

As indicated, mobile homes are not eligible for repairs under ZRP. However, information from Intake Forms and other data processing points concerning these structures will be collected into a separate data base in an effort to record any remaining unmet needs from the storm.

4.6 Household Must be Low-Moderate Income (LMI)

In order to meet the income eligibility requirement for ZRP, Applicants must be LMI with a total household annual gross income that does not exceed 80% AMI, adjusted for family size, as published annually by HUD. The Program will use the Internal Revenue Service (IRS) Form 1040 definition of income, as set forth in HUD regulations, for the purpose of determining Owner-Applicants' eligibility for ZRP. The IRS Form 1040 method of calculating income is often referred to as the Adjusted Gross Income or AGI method.

All household members included in the AGI calculation, if required to file, must provide a copy of their previous year's filed tax return or tax return transcript, if available, for the AGI of the household to be calculated. The Program will allow the use of the previous tax year's tax return in determining annual income for each adult household member and no other documentation will be required. However, the applicant will certify there has not been any substantial changes in income since the previous year's tax return. If there has been significant changes to household income, the Program may require additional income documentation to calculate income.

Situations may occur where a household member may have had no obligation to file a return, has not yet filed it, or filed an extension. If any household member did not file a prior year income tax return, the household member is required to submit current documentation that reflects their current income. The following income documentation will be required for each household member only if the type of income is applicable and if a prior year income tax return is not available:

- Wages: Three (3) recent paystubs within the past three (3) months, W-2 Forms;
- Retirement or Social Security:
 - Past three (3) Monthly Bank Statements (Social Security Benefits & Pension only),
 - Current Social Security Benefits letter (including benefits paid to minors),
 - Current Pension/Retirement Benefit letter (if applicable), or prior year 1099 form, or
 - Current Annuity Payment letter (if applicable), or prior year 1099 form;
- Self-Employment Income: Most recent tax return (1040 or 1040A), W-2 Forms; and/or Current year profit and loss statement;
- Unemployment Benefits: Current benefit letter with gross benefit amount;
- Court Ordered Alimony/Spousal Maintenance: Copy of court order documentation;
- Taxable Interest and Dividends (including amounts received by, or on behalf of minors);
- No Income: Adult household members who do not earn an income will be required to submit a Certification of No Income.

4.6.1 Household Size

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

4.6.2 Income Calculation Methodology

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

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

- Minors - Earned income of minors, including foster children (household member under age 18) is not counted. Unearned income attributable to a minor is included in the household income calculation (Examples include payments from trusts, stocks, bonds, etc. if the payments are taxable at the Federal level).
- Temporarily Absent Family Members - The income of temporarily absent family members is counted in the annual income, regardless of the amount the absent member contributes to the household. Temporarily absent family members are also counted as a member of the household when determining the household size.
- Permanently Absent Family Members - In situations where family members are permanently absent such as when a spouse is in a nursing home, the head of household has the choice of excluding the individual in the household composition, as well as any taxable income they receive. However, if the absent family member is included in the household composition, the taxable income must also be included in the total household income calculation.

In the event that one of the following special circumstances applies, the income of the referenced individuals will be excluded from the total household income calculation:

- Persons who are temporarily living with the applicant, including tenants.
- Persons who are employed by the household as a live-in aide and/or are a child of that aide.
- A temporarily absent individual on active military duty unless that person is head of the family, spouse or co-head.
- If an applicant is married and their spouse is permanently absent from the household.

4.7 Nonprofit Status and Proof of Service Area and Clientele

A Nonprofit Applicant must provide records of its registration with the Mississippi Secretary of State's Office, along with copies of its formation documentation. Furthermore, it must provide sufficient information, data, records, or other documentation that it services a low- to moderate-income and

vulnerable community in Harrison County through social and educational services and that these services are being provided at the community service building for which roof repair work is being requested.

5 Duplication of Benefits

Eligible applicants may have previously received assistance from other sources for the repair of their storm-damaged property. The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), as amended, 42 U.S.C. §5121 et seq., prohibits any person, business concern, or other entity from receiving federal funds for any part of such loss as to which he/she has received financial assistance under any other program, from private insurance, charitable assistance, or any other source.

During the application process, the applicant must report any and all assistance received from other sources for the repair, replacement, or reconstruction of their storm-damaged property. Previous funds received and reported by the applicant are verified by ZRP during the duplication of benefits (DOB) review process. Not all previous assistance received constitutes a duplication of benefits.

To determine if a duplication of benefit exists, ZRP first considers the “total assistance” available to each applicant. Total assistance includes all reasonably identifiable financial assistance available to the applicant. Total assistance does not include personal assets such as money in a savings account or credit cards. After total assistance has been determined, ZRP subtracts non-duplicative assistance received. Non-duplicative assistance is: (i) assistance provided for a different purpose than ZRP funds; or (ii) assistance provided for the same purpose as ZRP funds that was expended for a different eligible use.

Duplication of benefits occurs when total assistance received by the applicant exceeds non-duplicative assistance received by the applicant. If a duplication of benefits occurs, the applicant’s ZRP award must be reduced by the amount of the DOB.

5.1 Common Available Assistance

The following are sources of funding are commonly provided for structural damage and loss and are considered available assistance to the applicant, if the applicant received funding from any of these sources.

1. FEMA Individual Assistance for Structure (IA),
2. FEMA National Flood Insurance Program (NFIP),
3. Private Insurance,
4. Increased Cost of Compliance (ICC),
5. Small Business Administration (SBA)
6. Any other funding source available to the homeowner for the same purpose as a CDBG-DR grant that may duplicate assistance.

Funds received from any source including flood insurance, FEMA, and hazard insurance that were used to repair storm damage to the applicant’s roof prior to application to ZRP may reduce the amount of available assistance considered if the evidence of expenditures at least equals the amount of assistance provided from the source. Documentation must be provided demonstrating the cost and type of repair conducted.

Any additional funds paid to Owner-Applicant awardees for the same purpose as the ZRP roof repair award after the state has completed the roof repair must be returned to MDA.

Available assistance and non-duplicative assistance are described in greater detail in MDA-DRD's Duplication of Benefits Policy which can be found online at www.msdisasterrecovery.org.

5.2 Calculation of Duplication of Benefits

The DOB Review is conducted in accordance with HUD's guidance as outlined in Federal Register / Volume 84, No. 119, published on June 20, 2019 (84 FR 28836)9.

The basic framework for DOB review is as follows:

- Assess Applicant Need
- Identify Total Assistance Available
- Exclude Non-Duplicative Assistance
- Identify the DOB Amount & Calculate Total Award (including Program Cap)
- Reassess Unmet Need When Necessary

If the result of this is a positive number, the applicant has a *duplication of benefit gap*. Duplication of benefit must be deducted from the maximum roof repair award an applicant is qualified to receive under ZRP, in accordance with federal law. Because ZRP grants awards to eligible applicants in the form of roof repair, or replacement, with no funds being paid directly to the applicant, duplication of benefits must be resolved prior to award.

DOB is always a case-by-case determination. In this regard, HFHMGC will consult with MDA-DRD on any DOB questions which require technical assistance, and MDA-DRD will assist HFHMGC in formulating policies, where possible, that address broader DOD compliance issues.

5.2.1 Duplication of Benefits Gap

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

Applicants will be notified in writing if a DOB Gap is discovered. Applicants will have thirty (30) days from the date of notification of DOB Gap to appeal the DOB gap determination per the Appeals Rule (Section 16 of this Guidebook).

If an applicant cannot immediately provide funding to satisfy the DOB gap, the application will be placed in a hold status to be reviewed by HFHMGC after ninety (90) days and then again, if necessary, after one-hundred-eighty (180) days to determine if the applicant can provide the DOB gap funding. If after one-hundred-eighty (180) days the applicant cannot provide this DOB gap funding, then HFHMGC will close the application.

The program will not proceed with award or program-funded construction activities until the DOB Gap is resolved.

5.3 Subrogation

Applicants must subrogate any additional funds received for the same purpose as funds provided by ZRP back to the Program. CDBG-DR funding must be funding of last resort. If additional funds are paid to applicant awardees for roof repair or replacement after ZRP has completed the roof repair or replacement, those funds constitute a duplication of benefit and therefore must be returned to MDA. Applicant awardees will be required to sign a Subrogation Agreement as part of their grant agreement with the Program.

6 Damage Assessment

A damage assessment will be conducted at each property to confirm the property is an eligible structure type and to confirm the property has unrepaired storm-related roof damage. Information collected during the damage assessment is used for the following key program determinations:

- Eligibility – To be eligible for assistance, property must have remaining storm damage and the structure must be an eligible structure type. The damage assessment confirms both of these items. If it is discovered during damage assessment that the home does not have unrepaired storm damage or that the property is an ineligible structure type, the applicant will be deemed not eligible.
- Duplication of Benefits – During the damage assessment, the inspector creates a Damage Repair Valuation (DRV), which identifies remaining storm-related damage to the roof and any roof repairs previously made by the homeowner (if applicable). The DRV amount will be restricted to the valuation of remaining roof repair needs.

Program staff will conduct site visits to observe and record the presence of unrepaired Hurricane Zeta-related roof damage, determine the extent of the damage, and determine the estimated cost of repair (ECR). The homeowner should be present for these site visits.

The inspector will complete an environmental questionnaire at the time of the damage assessment and will document the age of the roof and the presence or absence of lead-based paint or asbestos and whether remediation will be required.

6.1 Valuation of Needed Repairs

The damage assessor will prepare an Estimated Cost of Repair, which provides a documented line-item by line-item estimate of the needed repairs observed during an onsite visit to repair the roof to program standards. The ECR quantifies the materials and labor necessary to repair observed damage and assigns a dollar value for each line item. Dollar values assigned to items quantified during the damage assessment will be based on Xactimate values for items and associated labor.

The ECR evaluation is based on costs developed by the construction industry for those items. The methodology used to prepare the ECR is to account for those scope items that can be counted, measured, or observed. This means that hidden damage is not accounted for during this process. For example, water damaged roof sheathing underneath the shingles would not be discoverable during the estimation process if the shingles and underlayment are intact.

7 Environmental Review

Environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. Every project undertaken with Federal funds, and all activities associated with such project, are subject to the provisions of the National Environmental Policy Act of 1969 (NEPA), 42 U.S.C. §4231 et seq., as well as to the HUD environmental review regulations at 24 C.F.R. § 58 on Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities.

ZRP conducts an environmental questionnaire on every project, prior to issuing a program award to ensure that the proposed activities do not negatively impact the surrounding environment and that the property itself will not have an adverse environmental or health effect on end users. Specifically, 24 C.F.R. § 58.22 limitations on activities pending clearance, prohibits the commitment or expenditure of federal or non-federal funds on any activity that could have an adverse environmental impact or limit the choice of reasonable alternatives prior to completion of an environmental review. ZRP is exempt under 24 C.F.R. §58.4(10), but is still subject to the requirements included in 24 C.F.R. §58.6, which include:

- Flood Disaster Protection Act (42 U.S.C. 4001-4128)
- National flood Insurance Reform Act (42 U.S.C. 5154a)
- Coastal Barrier Resources Act (16 U.S.C. 3501)
- HUD assistance for the purchase or sale of an existing property in a Runway Clear Zone or Clear Zone (24 C.F.R. part 51)

Environmental clearance must be obtained for each project prior to the commitment of federal or non-federal funds. A violation of this requirement may jeopardize Federal funding for the Program and disallow all costs that were incurred before completion of the environmental review.

During the environmental review, the program may determine that, due to extraordinary environmental conditions, repair is not feasible. In these cases, the property may be determined ineligible for assistance.

8 Roof Repair Award

Applicants who are deemed eligible, environmentally cleared, and with a \$0 DOB gap will be notified in writing that they are eligible to receive a roof repair award. The award letter outlines the amount of award the applicant is eligible to receive and next steps the applicant must take to accept the award. After the award letter is sent, the ZRP Intake Specialist will schedule a Homeowner Grant Agreement (HGA) signing event with each eligible applicant.

During the HGA signing event, the intake specialist will review the information outlined in the Homeowner Grant Agreement, homeowner responsibilities before, during, and after construction and status of utility bills. Applicants must demonstrate that they are current or on a payment plan in good standing for electric, sewer, and water service. Applicants who cannot prove utilities in good standing may not proceed with grant agreement signing, as utility arrearages may make it impossible for the program to complete roof repairs or replacement, as utility companies will not authorize reconnection of accounts in arrears.

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

If an applicant is deemed eligible and awarded, the repair award is determined based primarily on the following factors:

- Estimated Cost to Repair
- Award Cap of \$25,000

Program award will be adjusted, if necessary, to account for DOB.

8.1 Roof Repair Award Caps

The maximum roof repair award that will be granted is \$25,000. All costs associated with repair or replacement, historic preservation, and code compliance/permitting are included in the award cap.

8.2 Not Suitable for Repair

Properties not suitable for repair will be deemed ineligible for assistance. ZRP defines “not suitable for repair” as:

- Structures condemned by the Authority Having Jurisdiction: Properties condemned or “red-tagged” by the local authorities will not be repaired;
- Structures that cannot be repaired under existing Program caps, due to legal, engineering, or environmental constraints (permitting, extraordinary site conditions, etc.) will be considered not suitable for repair;
- Structures that are structurally unsafe or that have other conditions that make inspection by ZRP impossible or unsafe;
- Structures that have already been demolished; or
- Structures that require elevation.

8.2.2 Repair Scopes of Work

Program sponsored repairs are intended to repair eligible remaining storm-related roof damage only.

Repairs, upgrades, or modifications requested by the homeowner will not be considered.

9 Pre-Construction

After the Homeowner Grant Agreement (HGA) is executed, the case enters the “pre-construction” phase. During the pre-construction phase of the program, several key activities take place which prepare the project for the start of physical construction. Key activities which take place during the pre-construction phase of the program include, but are not limited to:

- Roof Contractor Assignment: ZRP assigns a program-qualified Roof Contractor (RC) to complete the construction project;
- Site Visit: The assigned Roof Contractor will visit the project site to finalize scope and schedule;
- Pre-Construction Meeting: The program will host a meeting with the applicant to review key items as related to construction;
- Permitting: The assigned Roof Contractor will obtain all permits required to complete the assigned construction scope of work.

9.1 Contractor Selection and Assignment

ZRP relies on a pool of qualified roof contractors (RC) to perform repair, and replacement work. Roof contractors will be assigned to complete construction work for eligible and awarded applicants. Roof contractors will be assigned by ZRP to each project after the Homeowner Grant Agreement has been executed. Applicants are not permitted to select or manage their own roof contractor.

ZRP will assign projects to roof contractors based on the roof contractor's performance history on ZRP projects and the roof contractor's capacity to take on additional jobs at the time the project is ready to be assigned.

It is the responsibility of HFHMGC construction staff to continually evaluate the Roof Contractor's performance on each project for future reference by Homeowners as well as maintaining eligibility status in the Contractor Pool. Roof Contractor's level of participation, number and amount of contracts awarded, number of contract extensions, quality of work, number of complaints and other criteria as deemed appropriate by program staff will be considered.

Roof Contractors with poor performance may be "suspended" from program participation and placed on "probation" for a period of time; continued poor performance and/or lack of program compliance by Roof Contractor may result in their removal from the Contractor Pool. All must be thoroughly documented by program staff with appropriate verification attached (Inspection reports, photographs of deficiencies, etc.).

9.2 Cost Estimate

As part of the procurement of roofing contractors, the program developed standards for pricing for ZRP awards. All costs incurred by ZRP must follow the Cost Principles outlined at 2 C.F.R. Part 200, Subpart E. When a contractor is selected, ZRP provides the contractor with a preliminary scope of work.

The program preliminary scope of work is documented in the Estimated Cost to Repair, which relies on Xactimate pricing and is prepared during the damage assessment phase by a third party inspector.

9.3 Pre-Construction Meeting

After the scope of work has been approved by the Program, the Roof Contractor and program staff will host a "pre-construction" meeting with each applicant. The purpose of the pre-construction meeting is to inform the homeowner of next steps, provide the homeowner with the scope of work that will be performed by the program, and answer any construction-related questions the homeowner may have. Key topics covered during the pre-construction meeting include, but are not limited to:

- Site Conditions: Project sites must be cleared of excessive debris. During the pre-construction meeting, the applicant will be informed of actions he/she must take to ready the site for construction. If the site includes excessive debris, the applicant must clear the site within thirty (30) days of the pre-construction meeting.
- Scope of Work: Program staff will present the applicant with a copy of the program approved scope of work.
- Scheduling: Anticipated time when work can commence and the estimated timeframe to complete work.

9.4 Permitting and Code Compliance

Mississippi does not have an adopted statewide residential building code. Roof contractors are required to complete all ZRP-sponsored construction activities in accordance with local building codes. Roof contractors are responsible for determining which permits are required and for acquiring all permits required to complete the ZRP-approved scope of work from the authority having jurisdiction for code compliance in the location where the construction project is located.

Applicants may be required to sign documents which authorize the Roof Contractor to obtain permits from the authority having jurisdiction. Because requirements vary by jurisdiction, documents which require the applicant's signature may also vary. If required to sign or complete documents in support of permitting, the applicant must do so within thirty (30) days of being presented with such documents.

Upon completion of the scope of work, a third-party inspector(s) will evaluate the project for completeness per the final scope of work and/or certification of a FORTIFIED designation.

Roof Contractors must demonstrate code compliance in order to pass a program final inspection. For repair projects, code compliance will be confirmed via Certificate(s) of Completion (or equivalent), as applicable, issued by the authority having jurisdiction. Certificate(s) of Completion issued for repair projects may vary, depending on the scope of work completed by the program

10 Construction

10.1 Green and Resilient Building Standards

HUD requires grantees to adopt Green and Resilient Building standards for new construction, reconstruction, and for rehabilitation activities of substantially damaged residential buildings, as stated in Federal Register Vol. 87, No. 23. Published on Thursday, February 3, 2022 (87 FR 6364). Grantees are strongly encouraged to also incorporate Resilient Home Construction Standards into all of their CDBG-DR programs.

Given the ZRP is limited to non-substantially damaged structures and is specifically addressing only unrepaired roof damage, the Program will incorporate the FORTIFIED Home program. The FORTIFIED Home program is a risk-reduction program providing construction standards for new homes and retrofit standards for existing homes, which will increase a home's resilience to natural hazards, including high wind, hail, and tropical storms. The FORTIFIED Home program has several different standards, ZRP will seek FORTIFIED Roof designations. Repairs where a FORTIFIED Roof designation is not feasible, attributes of the FORTIFIED Roof standard will be incorporated into the repair.

10.2 Eligible Construction Activities

Roof Contractors are only authorized to perform construction activities that are duly authorized by an approved ZRP scope of work or via an approved change order. Homeowner requests for upgrades, modifications, and/or additional work shall not be considered. Program scopes of work, including all items outlined in the bulleted list below are subject to ZRP award caps.

Program scopes of work may include:

- **Repair work:** Repair work includes items required to complete repair of the roof. Repair work is intended to repair storm-related damage and bring the items repaired into compliance with local building codes.
- **Historic Preservation:** Section 106 of the National Historic Preservation Act of 1966 (Public Law 89-665), as amended in 2000, requires Architectural History compliance imposed by the Compliance and Review Section of the Bureau of Historic Preservation, as needed. If the Mississippi Department of Archives & History (MDAH) or other authority having jurisdiction requires specific construction or design measures to prevent an adverse effect to a historic or cultural resource, such activities may be included in the program scope of work.
- **Mitigation Measures:** Measures to make homes more resilient in the face of future disasters such as but not limited to sealed roof decks or impact resistant shingles, may be included in program scopes of work.

The above bulleted list is not intended to be an exhaustive or all-encompassing list. All construction work undertaken by Roof Contractors must be approved via an approved cost estimate or duly authorized change order. Any work completed by roof contractors prior to authorization by ZRP is completed at the roof contractor's own risk.

Applicant-requested upgrades, additions, or modifications to construction scopes of work will not be considered. Applicants may not pay out of pocket for upgrades, additions, or modifications concurrent with program sponsored construction.

10.3 Construction Warranty

The Roof Contractor shall warrant work and craftsmanship and any materials provided as described in the Mississippi New Home Warranty Act or any subsequent legislation modifying or replacing that Act or other applicable laws, codes, or standards. The period of Warranty on all work shall run for the longer of: a) the maximum term required by the MS New Home Warranty Act or other applicable laws, codes, or standards or b) one year.

The warranty period shall begin at the date of formal acceptance of the work by the Owner-Applicant.

10.4 Construction Progress Inspections

All ZRP construction projects must pass program inspection(s) and a final construction inspection. The goal of program inspections is to confirm that construction work is being completed in accordance with the ZRP-approved scope of work and that work is of sufficient quality. Program inspectors are not municipal code inspectors and program inspections do not supersede required municipal code inspections. Additional inspections may be required for FORTIFIED Roof designations. Roof contractors are responsible to coordinate municipal code inspections, as required by the authority having jurisdiction to close permits and/or obtain a certificate of occupancy or certificate(s) of completion (or equivalent).

10.5 Change Orders

From time to time, it may be discovered that the construction scope of work originally approved by ZRP must be altered to deliver a satisfactory work product within acceptable timeframes. ZRP allows for the

use of change orders to modify the program-approved scope of work. Change orders must be initiated by the Roof Contractor. Roof Contractors must substantiate the need for the change order and demonstrate that costs associated with the change order are reasonable. Change orders initiated by the homeowner will not be considered under any circumstance.

With exception of items which pose an immediate health or safety risk, Roof Contractors must seek change order approval prior to commencing work not included in the ZRP-approved scope of work. Roof Contractor requests for change order after the project passes a program final inspection will not be considered.

11 Applicant Responsibilities

For ZRP to be successful in providing applicants with repair awards, the applicant must participate and comply with program timeframes, directives, and requests. ZRP is a voluntary program. Applicants who do not wish to comply with all or some of the applicant responsibilities may opt to withdraw from the program at any time prior to construction start.

11.1 Flood Insurance Requirement

11.1.1 Prohibition of Assistance for Lack of Flood Insurance Coverage

Consistent with the requirements of Section IV.E.2 of the Consolidated Notice, MDA-DRD cannot award CDBG-DR grant funds for assistance for flood-related damages if the recipients of such funds received Federal flood disaster assistance that was conditioned upon obtaining and maintaining flood insurance and such insurance was not maintained.

Therefore, in administration of its CDBG-DR programs, MDA-DRD will make a determination regarding whether the applicant's damages are wholly attributable to wind or other non-flood damage. MDA-DRD's determination will be documented in the file for the affected property. If damages are wholly non-flood damages, this prohibition policy is not applicable, and MDA-DRD's analysis will end.

In the event the damages being remediated are flood-related, MDA-DRD will make a determination regarding whether the applicant previously received Federal flood disaster assistance. If Federal flood disaster assistance was previously provided, the applicant will be required to provide proof of insurance. Failure to provide such proof of insurance will result in the applicant being deemed ineligible for CDBG-DR assistance.

12 Applicant Cooperation with the Program

Throughout the life of an applicant's participation in ZRP – from submission through closeout of the application – the applicant must participate and respond to requests from the program in a timely manner. At no point should a request from the program go unanswered for more than thirty (30) days.

ZRP will send applicants with outstanding requests from the program a Pending Action Notice to inform the applicant of the outstanding request(s). The Pending Action Notice informs the applicant that the program requires action from the applicant in order to proceed and that if the applicant does not complete the required action within thirty (30) days, the applicant's case will be closed. Common outstanding requests include, but are not limited to:

- Documentation: The program requires documentation from the applicant for multiple reasons and at multiple phases throughout the program. Not all requests for documentation are for documents an applicant must produce. Some documentation requests may be related to documents generated by the program that the applicant must sign. Applicants must submit and/or sign requested documents in a timely manner.
- Schedule: The program requires applicant cooperation and participation at multiple points throughout the process. Applicants must schedule and attend required appointments, inspections, or other required meetings in a timely manner. ZRP will make reasonable attempts to coordinate schedules with homeowner availability. Applicants who refuse to schedule or attend required meetings or inspections may be sent a Pending Action Notice.

12.1 Non-Responsiveness

Applicants who do not take the required action(s) within thirty (30) days of the Pending Action Notice will be closed. Applicants who require assistance, clarification, or an extension to the thirty (30) day timeframe to resolve a pending action must request assistance within the thirty (30) day window. Extensions to the thirty (30) day window will be considered on a case-by-case basis.

The program will make reasonable attempts to contact applicants to schedule meetings, collect documentation, or obtain other information necessary. If the program has made three (3) consecutive unsuccessful attempts to contact an applicant with no follow up contact from the applicant, the applicant will be sent a Non-Responsive Notice. The Non-Responsive Notice provides contact information for the program, advises the applicant of the next steps in the application process, and notifies the applicant that he/she must contact the program or complete an action within fourteen (14) days of the date of the letter. If the applicant fails to contact the program or complete the action within the fourteen (14) days allowed, the application will be closed. Applicants who become non-responsive after construction activities have commenced may be subject to repay program funds expended on construction activities prior to the application being closed.

12.2 Applicant Responsibilities During Construction

During the construction phase of the program, the applicant has several ongoing responsibilities. The construction phase begins when the homeowner-applicant signs the Homeowner Grant Agreement, and ends when the homeowner executes the Homeowner Acceptance of Work. Applicant responsibilities during construction include:

- Applicants must coordinate with assigned Roof Contractor to sign any required permitting documents.
- The homeowner must allow the Roof Contractor and ZRP representatives full access to the property. If reasonable and timely access to the property is denied by the applicant, ZRP may terminate the award and the applicant may be subject to repay any program funds expended on the project.
- The homeowner must allow inspections to be performed by ZRP representatives and municipal code inspectors. If reasonable and timely access to the property is denied by the applicant, ZRP may terminate the award and the applicant may be subject to repay any program funds expended on the project.

- The homeowner must remove and/or secure any animals or pets that remain on property during construction. Animals will only be allowed to remain on property during construction if the Roof Contractor confirms there is sufficient space and sufficient enclosure for the animals to remain on site without interfering with construction work. If there is not enough space or if animal enclosures are not sufficient, animals must be removed from the property. ZRP will not cover costs associated with removal and/or boarding of animals during construction.
- Applicants must keep current on all utility bills during construction.

13 Voluntary Withdrawal

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

Applicants may indicate a desire to withdraw to any ZRP representative. It is preferred, but not required, that an applicant who wishes to withdraw submit his/her withdrawal request in writing. After an applicant request to withdraw, he or she will be sent a Voluntary Withdrawal Notice. The Voluntary Withdrawal Notice informs the applicant that ZRP has received his/her request to withdraw, and that the applicant has fourteen (14) days from the date of the letter to rescind the withdrawal request. If the applicant does not rescind the voluntary withdrawal request within the fourteen (14) day period, the applicant's case will be closed as withdrawn.

14 Fraud, Waste and Abuse

MDA, as grantee, is committed to the responsible management of CDBG-DR funds by being a good advocate of the resources while maintaining a comprehensive policy for preventing, detecting, reporting, and rectifying fraud, waste, abuse, or mismanagement.

Pursuant to 87 FR 6364, MDA implements adequate measures to create awareness and prevent fraud, waste, abuse, or mismanagement among other irregularities in all programs administered with CDBG-DR funds as well as encourages any individual who is aware or suspects any kind of conduct or activity that may be considered an act of fraud, waste, abuse, or mismanagement, regarding the CDBG- DR Program, to report such acts to the CDBG-DR Internal Audit Office, directly to the Office of Inspector General (OIG) at HUD, or any local or federal law enforcement agency.

14.1 Reporting Fraud

Any allegations of fraud, waste, abuse, or mismanagement related to CDBG-DR funds or resources must be reported to the MDA-DRD Monitoring Department, to the Office of the State Auditor, or directly to the OIG at HUD, or any local or federal law enforcement agency.

Any person, including any employee of the CDBG-DR Program, who suspects, witnesses, or discovers any fraud, waste, abuse, or mismanagement, relating to the CDBG-DR Program, should report it immediately by any of the following means:

Reporting Fraud, Waste and Abuse	
MDA-DRD Online	AFWA Submission Form available at www.msdisasterrecovery.org
MDA-DRD Email	disasterrecovery@mississippi.org
OSA Confidential Fraud Hotline	1-800-321-1275
Online	https://www.osa.state.ms.us/fraud/

Allegations of fraud, waste or abuse can also be reported directly to the OIG by any of the following means:

Reporting Fraud, Waste and Abuse	
HUD OIG Fraud Hotline	1-800-347-3735 (Toll-Free)
	787-766-5868 (Spanish)
Mail	HUD Office of Inspector General (OIG) Hotline 451 7th Street SW Washington, D.C. 20410
Email	HOTLINE@hudoig.gov
Online	https://www.hudoig.gov/hotline

15 Complaints

In accordance with HUD guidelines, ZRP will provide a timely written response to applicant complaints within fifteen (15) working days of receipt when practicable. If a complaint cannot be addressed within fifteen (15) working days, ZRP will notify the complainant of the need for additional time and an estimated resolution/response timeframe.

Applicants who wish to submit a formal complaint may do so through any of the following avenues.

- Via Email: cpoppendieck@hfhmgc.org
- In Writing:
 - Zeta Roof Program
 - 2214 34th St., Gulfport, MS 39501
- Via Telephone: 228-678-9104
- In person:
 - Habitat for Humanity MS Gulf Coast
 - 2214 34th St., Gulfport, MS 39501

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

16 Appeals

Applicants who wish to contest a Program determination may request an initial appeal directly with the Program by submitting a written request via electronic or postal mail within thirty (30) calendar days from the date of the determination being contested. Applicants may request an appeal to contest:

- Eligibility determination;
- Repair Award amount
- Duplication of Benefits Gap determination;

An applicant cannot appeal program policies, federal regulations, or state statutes. Appeals filed based on these reasons will be denied.

Appeals are determined solely on the written record; there will be no hearing or other oral proceeding conducted. In this regard, the appeal must address the grounds for changing the Program decision. Furthermore, the appeal must provide copies of all documents, records, papers or other information to support the appeal. In addition, all appeals must be dated and contain the applicant's name, application number, the applicant's current mailing address, and the address of the property for which an application is being made (if applicable). Persons who wish to request an initial appeal related to ZRP may do so through any of the following avenues:

- Via Email: info@ZetaRoof.com
- In Writing:
Zeta Intake / Habitat for Humanity MS Gulf Coast
Attn: Appeals
2214 34th St. Gulfport, MS 39501

The ZRP Appeals Coordinator will conduct an initial review using the request and supporting information submitted by the applicant and make a determination. When practicable, the determination will be made within ten (10) business days. Applicants will be notified in writing of the determination made on their initial appeal via an Initial Appeal Determination Notification.

Following this, an applicant may appeal the Initial Appeal Determination Notification to MDA-DRD by giving written notice within thirty (30) calendar days of the date of the Initial Appeal Determination Notification. The appeal must actually be received by MDA-DRD at the address below by the 30th day. If an appeal is not submitted within the thirty (30) calendar day timeframe, the applicant will be deemed to have waived his or her right to appeal the Initial Appeal Determination Notification.

These appeal requests must also be written and state with specificity the basis for the applicant's disagreement with the Initial Appeal Determination Notification. Again, these reviews are determined solely on the written record; there will be no hearing or other oral proceeding conducted. In this regard, the appeal must address the grounds for changing the Initial Appeal Determination Notification.

To be accepted, the written appeal must be delivered:

U.S Mail to the following address:

Mississippi Development Authority – Disaster Recovery Division
Attn: Appeals Coordinator

P.O. Box 849
Jackson, Mississippi 39205

Or by Courier or hand-delivery to:

Mississippi Development Authority – Disaster Recovery Division
Attn: Appeals Coordinator
501 North West Street
Jackson, Mississippi 39205

MDA-DRD will review the appeal and all supporting material, along with the applicant's files. A final written determination of the appeal will be made and issued by the Director of MDA-DRD or the Director's designee.

The applicant will be notified in writing by Certified Mail of this final determination of the appeal within ten (10) calendar days of the issuance. A copy of the final written determination will be provided to the applicant. All appeal determinations made by MDA-DRD are final with no further administrative review and are not subject to judicial review.

See MDA-DRD's Appeal Guidelines which are available online at: www.msdisasterrecovery.com.

An applicant can withdraw the appeal at any time by providing written notice to HFHMGC or MDA-DRD of this decision at the designated address for each referenced above.

17 Exceptions to Program Policies

The ZRP Guidelines set forth the policy governing the program and approved ZRP Standard Operating Procedures set forth the procedures by which policy will be enacted. The Guidelines and the SOPs are intended to guide program activities and enforce compliance with applicable federal regulations. While Program Guidelines and SOPs govern the program, neither should be considered exhaustive instructions for every potential scenario that may be encountered by the program. At times, exceptions to program policies and/or procedures may be warranted. All exception requests are reviewed and adjudicated on a case-by-case basis as need arises, at the sole discretion of MDA. Exceptions may be granted to program policy or process. However, exceptions to federal regulations, laws, or statutes shall not be authorized.

19 MDA Administrative Policies

As a recipient of CDBG-DR funds, there are several policies, procedures, and regulations which apply to all programs, projects, and initiatives undertaken as part of MDA-DRD's CDBG-DR grant programs. These policies and procedures include: financial management, fair housing, conflicts of interest, section 3 compliance, procurement, monitoring, reporting, recordkeeping, and others. These policies and procedures are available on the MDA-DRD website at www.msdisasterrecovery.org.

20 Closeout

Owner/Occupant applications will be closed upon completion of construction work and upon applicant execution of the Homeowner Acceptance.

ZRP Program staff will perform a complete review of the application file to ensure all necessary documentation is present and to ensure that the case is ready for closeout. By the time a case reaches closeout, the case has undergone several QC checkpoints and various approvals at specific stages. Because the case has undergone such extensive quality control throughout each stage of the program process, closeout review is intended to provide a completeness review of each individual application; rather than a comprehensive quality control review of each step.

When all quality control review levels have been approved, the applicant will be sent a Final Notice from the Program, informing the applicant that his/her case has been closed.