

Memorandum

TO: Local Governments participating in Coronavirus Relief Funds (CRF-2)

FROM: Robert Dearduff, Assistant Director of Special Programs

SUBJECT: Technical Guidance-2 Davis-Bacon Act Requirements

DATE: October 14, 2020

In the subrecipient agreements executed between local governments and Florida Housing for CRF-2 funds, there is a reference to Davis-Bacon [subsection L (D)]. The language states “When required by Federal program legislation...”

After further discussions with the Governor’s office, we have concluded that the Davis-Bacon Act requirements on wage determinations is not applicable to the expending of CRF-2 funds for emergency repairs *unless* the CRF-2 funds are combined with other Federal funds that require adherence with the Davis-Bacon Act. For projects funded by CRF only or those combining CRF and SHIP funds, there is no requirement for Davis-Bacon.

This clarification does not change the requirements that all emergency repairs are:

1. Identified as having occurred since March 1, 2020;
2. Affecting a household that has a documented COVID hardship and the homeowner cannot afford the repair;
3. Addressing a repair that is a potential hazard to the household (safety, health); and
4. Within previous guidance of the types of repairs that are eligible.

Ron DeSantis, Governor

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