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ST. JOHN'S COUNTY EMERGENCY RENTAL ASSISTANCE GRANT PROGRAM PROCEDURES HANDBOOK

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Emergency Rental Assistance Program Procedures Handbook Revisions History

Version	Effective Date	Description
Version 1.0		

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Overview

The Emergency Rental Assistance Program (ERAP) was established by section 501 of Division N of the Consolidated Appropriations Act, 2021 (Act). The Act allocated \$25 billion to the U. S. Department of the Treasury (Treasury) to provide funds directly to states, territories, local governments, and Indian tribes for households that are unable to pay their rent and utilities due to the financial impacts of the COVID-19 pandemic. St. Johns County received \$7,991,953.00 for the Emergency Rental Assistance Program.

Emergency Rental Assistance Program funding may only be used to provide financial assistance for rent, utility and home energy, and housing stability services to eligible households. All household applicants, landlords, utilities, and home energy service providers must provide an attestation that all information included in the application for assistance is true, correct, and complete.

These Guidelines outline the St. Johns County Emergency Rental Assistance Program requirements for eligible applicants through guidelines, and the administration requirements through policies and procedures. Guideline users may include potential applicant households, property owners, management agents, utility companies, St. Johns County staff, as well as staff or agents of the U.S. Department of the Treasury, including the Office of Inspector General.

Authorization and Source of Funds

The Consolidated Appropriations Act, 2021, Division N, Title V, Section 501, Public Law 116-260 (Dec. 27, 2020) established the Emergency Rental Assistance Program. Treasury provided funds directly to states, local governments with populations of 200,000 or greater, and Indian Tribes to aid eligible households that are unable to pay rent and utilities due to the COVID-19 pandemic.

The Code of Federal Domestic Assistance number for the Emergency Rental Assistance funding is 21.023.

Procedures

Outreach and Engagement

The Program will develop specific assistance priorities and create a broad-based community outreach plan that explains the program purpose, eligibility and describes the application and payment processes through the development of a Communications Plan. This Communications Plan serves the following purposes:

- As the National Eviction Moratorium is close to expiring on July 31, 2021, emergency rental assistance has played an integral role in assisting local renters to remain secure in their homes and avoid future evictions during the COVID-19 pandemic.
- The Program will develop a strategic communications plan and recommended outreach efforts to ensure it effectively reaches the following applicants:
 - a. Households under 50% AMI
 - b. Household under 80% AMI
 - c. Landlords
 - d. Utility Providers

Methods for Outreach and Community Engagement

As norms continues to change, the methods for communication to reach the majority of the community must include a variety of modalities. These include but are not limited to:

- press releases,
- inserts into mailed jurisdiction-owned utility bills or advertising packets,
- radio advertisements,
- bus bench and bus side panel advertising,
- social media posts such as Facebook, Twitter, and Next Door,
- links on agency webpages,
- e-newsletters,
- e-mail notifications to interested parties, and
- website information.

Compliance for Communications

All outreach and advertising of program details will meet the required Americans with Disabilities Act requirements, as well as being available in the following languages:

- English
- Spanish Application Intake

Applications will be submitted through an online application, whether this is on a smart phone, tablet, or desktop computer. It is anticipated that the majority of applications will be generated by an adult household member.

The online system will open to a pre-screening page that includes four pre-qualification questions that will allow potential applicants to self-screen their eligibility. The pre-screening questions address the following categories:

- Applicant household is a tenant.
- Someone in the household is receiving unemployment benefits or has experienced negative financial impacts due to the COVID-19 pandemic.
- Household is experiencing housing instability or is at risk of homelessness.
- Total household income is at or below 80% of the AMI for the area where the rental unit is located.

Based on the answers to the questions, the potential applicant will be provided feedback about whether or not they meet the criteria for the ERA program. Along with a "It looks like you do not meet the criteria for Emergency Rental Assistance," information on contacting St. Johns County Social Services at 904-209-6140 to learn about eligibility for the program or to request a reasonable accommodation will appear.

If the household successfully meets the pre-screening criteria, the system will display a message notifying the applicant that they may be eligible for assistance and that they will need to complete an application.

The online system will require the applicant to identify a Head of Household member (first and last name) and to establish login information, which will include an email address, phone number, password (which will be required to be confirmed).

Applicants who have questions about creating and submitting application, are experiencing difficulties with the online application may contact the call center at 904-344-3188 or 800-557-7441 for assistance. The call center can answer questions regarding eligibility, as well as guide an applicant through the application process.

Information Necessary to Create and Submit a Tenant Application

Applicants will be required to provide details about their household, the rental property, lease, utility, total household income and COVID-19 impacts.

The St. Johns County ERAP portal will require the following information to create an account:

Tenant Household intake will require valid information for the following:

- rental address
- applicant identification
- total household income
- unemployment details for household members, if applicable
- COVID-19 impacts
- assistance request
- lease for household rental unit
- attestations, as required.

To qualify for rental assistance, applicants must meet the minimum eligibility criteria stated in the Program Guidelines. Applications must reflect each program requirement and be supported with verifiable documentation. Submission of an application does not guarantee financial assistance.

Landlord Intake

Landlord intake will include providing valid information for the following:

- lease for applicant household as tenants at subject property address
- rent ledger showing applicant household is behind on payments.
- notice of past due rent.
- Eviction Notice.
- W-9.
- payment information including mailing address.

Utility Providers do not have an Intake Portal

Utility Provider will not have a separate intake portal. Applicants will input the outstanding utility and home energy details in their application, if applicable, and utility and home energy providers will be contacted to validate the amounts of assistance requested and to provide the payee information.

Case Management: Processing of Applications

Case Management validates the information submitted in the applications, whether generated through the tenant or landlord portal. The application intake process must be completed for the application to be accepted into the system and moved into Case Management. Case Managers will validate the information in the system and the uploaded documentation for each of the areas of eligibility.

Application Assignments

Case Managers will assign themselves applications based on the next priority application in line. Applications may be reassigned by Case Manager Supervisors.

Identification

Applicants are required to provide documentation that verifies their identification. This may be substantiated with an uploaded photo of their driver's license, passport, or other government-issued identification.

Case Managers must compare the name and address for the household member in the system to the documentation uploaded and confirm it matches. Any discrepancies must be explained and documented, with notations describing the issue and resolution within the system.

Place of Residency as a Renter

A copy of the fully executed lease agreement between the applicant household and the landlord will document that the household is renting the unit. Case Managers must compare the property information against the uploaded documentation to ensure the household's residency has been established. Case Managers must also ensure there are not discrepancies between the information provided to support rental residency does not conflict with documentation or information provided to establish the applicant's identity. Any discrepancies must be explained and documented, with notations describing the issue and resolution within the system.

COVID-19 Hardship

Applicants will be required to demonstrate that one or more of the household members has experienced at least one of the following:

- Is unemployed and has been for 90 days prior to the application,
- Reduction in income,
- Incurred significant costs, or
- Experienced financial hardship, either directly or indirectly due to COVID-19.

Examples of significant costs or financial hardship may include, but is not limited to:

- Penalties, late fees, legal costs, or other fees associate with late or non-payment of rent or utility service.
- Rent or utility costs paid by credit card to avoid becoming homeless.
- Increased child-care costs
- Increased healthcare costs, including those for caring for individuals with COVID-19 at home.
- Internet access and/or computer equipment costs required to work from home or attend school online from home.
- Unable to find work due to business closures, reduced job opportunities and high unemployment numbers.

The applicant must provide sufficient documentation to demonstrate that the household meets these criteria.

Risk of Homelessness or Housing Instability

Households must indicate if they are at risk of housing instability or becoming homeless. This is done through a self-attestation. Supporting documentation must include a past due rent notice, past due utility bill, or an eviction notice.

Total Household Income

Each applicant must complete the information regarding total household income. Applicants will have the opportunity to report their total gross household income from all sources as either:

- 2020 Annual Income, or
- Monthly household income, current at the time of application.

2020 Annual Income is documented by submitting a copy of the 2020 1040 Income Tax Return (all pages) or by submitting all wage statements (W-2's), unemployment compensation earnings statements, 1099's, Balance Sheet showing net business income, interest statements, and other taxable income.

Monthly Income is documented through paystubs, account statements showing interest, unemployment payments, gig economy payment notifications, or other sources of income that will be reportable and taxable at the end of the year. Applicants are required to submit a minimum of 60 days income.

Case Managers must convert monthly income into an annual amount. If the household supplies two months income, that amount will be multiplied by 6 to determine the total annual household income. If the household provides 3 months income, the income is multiplied by 4 to arrive at the total annual income.

All application files require income determination. If a household indicates they receive their income in cash, the household must sign bank statements to show deposits, and a Case Manager Supervisor must review and approve the application. The file must support a situation where the family is likely to receive payments in cash; if a household has submitted automatic payments for utilities as evidence of residency, for instance, it may be unlikely the household lives on a cash economy.

Additionally, if a household indicates they have no income, in addition to the self-attestation of no income the file must support how the rents, utilities, food, transportation and other costs of living are paid.

All discrepancies must be explained, supported by documentation, and noted in the file.

Contact with Applicants, Landlords, Utility or Home Energy Providers

Case Managers must contact the appropriate parties to resolve incomplete or conflicting information.

The Case manager can make contact via email, text, or phone call. All contact with applicants, landlords, or utility providers will be documented in the system.

Assistance Requested

Applicants will enter the type and amount of assistance they are requesting. Rent and utility amounts will be indicated for the months owed.

Validation of Assistance Requested

Landlords must provide the period and amounts of rent owed for the household. Utility providers must provide the period and amounts of utility charges owed for the household.

Case Managers must compare the amounts requested by the applicant to the amounts reported as due by the landlord and/or utility provider. The periods of time and the amounts due must match. Any discrepancies must be resolved, documented, and noted in the file.

False Claims

Any false claims that are made in connection with the application, by the Landlord or the Tenant including statements as to the facts stated in the application for assistance are true and correct will be considered to be an act of perjury. The program participants will be advised in writing that knowingly making a false written declaration may be charged as a felony of the third degree. Program participants will acknowledge that they may be prosecuted by Federal, State, or local authorities and/or that repayment of all St. Johns County funds shall be required if they make or file false, misleading, or incomplete statements and/or documents.

Decision Process

Once the Case Manager has reviewed the file and confirmed all required information has been received, reviewed, and accepted, and the amount of assistance has been confirmed, the file will be ready for approval or denial. The Case Manager must ensure all checklists in the file have been completed, all required documentation supporting the household's circumstances are in the file and the amount of assistance meets the ERAP guidelines.

If the review of the file determines the household is eligible and the amounts and types of assistance are eligible, the file may be recommended for approval. The Case Manager will review each file, using the checklist provided in the program platform. Once all processes of application review have been completed (including receiving and reviewing all documentation; eligibility criteria; prioritization criteria; household income has been determined; amounts of rent, and other expenses related to housing incurred due, either directly or indirectly, to the COVID-19 outbreak have been confirmed; and payment information has been received by the landlord and duplication of benefits and property ownership has been verified), applications will be recommended for approval or denial and forwarded to the Case Management Supervisor for final approval.

QA/QC

The Case Management Supervisor will review each denial file and will also pass 10% of each day's files to QA/QC who will review the files and return them to the Case Management Supervisor before they are released to the queue for payment. QA/QC should occur within 24 hours of receipt by QA/QC. All completed QA/QC files will be returned to Case Management Supervisor once they have passed review or returned to the Case Manager if they do not pass. If a file has been rejected by QA/QC, it must be corrected and returned through QA/QC a second time before it is returned to the Case Management Supervisor for final approval and released into the queue for payment.

Households that do not meet one or more criteria will be notified of the denial determination via email.

Notification of Approval/Denial

The Tenant and Landlord will be provided notice of approval via system generated email to each. The email will include information about when the check will be processed. If the application is denied, the applicant has the right to appeal.

Appeals Process

Once applicants have received the determination notice of the approval or denial of their request for assistance, applicants may appeal the following decisions:

- Eligibility determination (criteria for household size, income, or property standards).
- Amount of assistance to be provided (amount due, amount of assistance received, and/or period of assistance), including zero assistance: and/or
- Additional assistance needed to ensure housing stability determination.

All appeals will be reviewed and resolved by the Program Lead with assistance from the Case Management Supervisor. The actual appeal will be prepared by the Case Manager based on information and evidence provided by the applicant. ERAP applicants or participants may request an appeal of a decision **within 14 days of the determination notice** from the ERAP Case Management System

The appeal must be submitted in writing via the link, email or regular mail and must include supporting documentation. The decision of the Program Lead will be provided to the applicant in writing and the application will be processed through to approval or denial.

Applicants may only appeal once; decisions made by the Program Lead will be final.

Violence Against Women Act

Pursuant to 24 CFR 92.359, the Program will provide form HUD-5380- Notice of Occupancy Rights Under VAWA and HUD-5382- Certification of Domestic Violence, Sexual Assault, or Stalking, and Alternative Documentation, and the TBRA Lease Addendum with VAWA Protections to all TBRA participants. Under VAWA protections, the lease may be bifurcated to allow the owner to remove only the tenant(s) engaged in criminal activity, while the remaining tenants retain TBRA assistance. Limitations of VAWA protections:

- VAWA does not supersede the obligation to pay rent.
- Violation not premised on an act of domestic violence, sexual assault, or stalking.
- Court order regarding right of access / control of property or distribution / possession of property
- Actual and imminent threat to other tenants
- Failure to provide victim status documentation, if requested by property owner or County

Information shall be maintained as confidential in accordance with applicable law. The following types of information must not be entered into shared database or disclosed to any other entity or individual, except to extent the disclosure is: a) requested/consented to in writing by victim in time-limited release, b) required for use in eviction proceeding or termination hearing; or c)

otherwise required by applicable law. Confidential information concerning incident(s) of violence, includes:

- Fact that applicant or tenant is a victim.
- Any information on certification form, other victim status documentation, or emergency transfer request.
- Information provided by applicant/ tenant regarding VAWA inquiry or assertion of rights.

The Program must maintain records and annually report on:

- Emergency transfers requested.
- Outcomes of those requests

Payment process

Once the application is complete and all documentation is included, the Case Manager will recommend that the file been approved or denied. All of the files will be subject to a QA/QC review, and the Case Manager will move an application to the Case Manager Supervisor for final review and preliminary approval. When final approval from the County is authorized, the following information will be submitted to the Unqork /JP Morgan platform:

- Landlord payee name
- Date
- Remittance address
- Award value
- Service period
- Tenant Name
- Case number
- Invoice number

Award disbursement will occur via disbursement by check directly to the landlord or utility provider and be recorded within the Finance Plus System. The Process for Accounts Payable Entry and Disbursement is attached hereto as Exhibit "A" and by reference made a part thereof.

Monitoring

See the Monitoring Manual for details about Program monitoring requirements.

Non-Compliance of Contractors

If, through its monitoring, Witt O'Brien's determines that any sub-contractor is not in compliance with the terms and conditions of the program policies and procedures, then Witt O'Brien's will provide written notice of the non-compliance and will allow (10) days for the contractor to remedy the error. Witt O'Brien's can terminate the contract with its subcontractors at any time by giving at least ten (10) days' notice in writing. If the actions

of the contractor are not legal, then Witt O'Brien's will report the contractor for disbarment and will pursue legal remedies for repayment.

Closeout

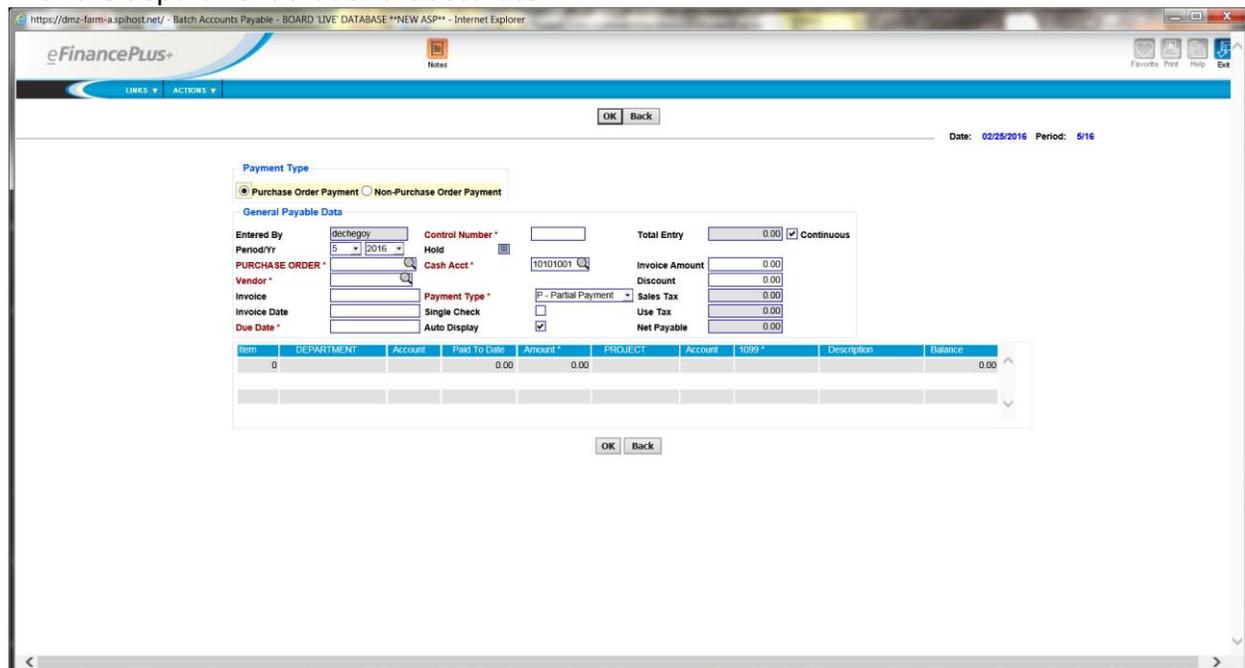
See the Closeout Manual for details about Program closeout requirements.

References

- St. Johns County ERAP Policies
- St. Johns County ERAP Guidelines
- St. Johns County ERAP Monitoring Plan
- St. Johns County ERAP Closeout Manual

	<p>STANDARD OPERATING PROCEDURES</p> <p>DEPT <u>BOCC Finance</u></p> <p>DESCRIPTION <u>A/P Payable Entry</u></p>	<p>DATE <u>2/24/16</u></p> <p>SOP # _____</p>
<p>PURPOSE:</p>		
<p>PREPARED BY: Donna Echegoyen</p>		<p>REVIEWED BY:</p>
<p>#</p>	<p>STEP</p>	
<p>1</p>	<p>Stamp all incoming mail and sort alphabetically. Divide up between the three A/P persons or put in the main inbox to be picked up as necessary.</p>	
<p>2</p>	<p>Review all invoices to make sure they have department coding and proper signatures. Confirm unknown signatures with the main book as well as confirming with the current authorization list.</p>	
<p>3</p>	<p>Code all invoices with the appropriate vendor number by searching for them in the system under Fund Accounting/Reference Tables/Vendor List. If not there, write 'New' and give to Assistant Finance Director.</p>	
<p>4</p>	<p>Go to Fund Accounting/Payable Entry/Batch Accounts Payable and select 'New' at the top of the screen. This will bring you to an entry screen.</p>	
<p>5</p>	<p>Choose whether you are entering an invoice with or without a PO, and then create the Control # usually your initials and the date (DE022416) this will be your batch number. You will need to change the variation of this number when entering more than one batch on the same day. Tab through to the next field which will ask for the PO # or Vendor # depending on which option you chose to enter an invoice at the top. Tab through the fields entering information as asked, invoice #, invoice date, Due Date is always Friday of the current week's processing. Checks are cut the Tuesday after the Friday due date, with the actual cut off being Thursday for receipt of invoices for the week. At the top section there will appear a note of whether this is an EFT vendor or not-EFT vendor invoices are marked with EFT written on them so that they can later be filed accordingly. When this is an invoice with a PO, you will select if this is a partial payment or a final payment. If final is marked and it's not the end of the year, you may want to confirm</p>	

with the department that this is accurate.



- 6 When you reach the section with the Department and Account number listing, enter the information as it appears in the coded portion of the invoice, along with the appropriate dollar amount and description. There is an opportunity to change whether this is reported as taxable or not on the entry line. Say OK when complete and a new entry screen will appear.
- 7 After all invoices have been entered into the batch, run a tape on the invoices and compare to the batch total on the Batch Accounts Payable screen for your batch. If correct, print out a Batch Payables Edit List choosing print in the upper right corner of the screen. The prompt will ask if you would like to print the text associated with the batch, click on No. This defaults to show on your screen, once you have confirmed it's the correct batch, select print at the bottom of the screen.
- 8 Give the batch invoices and Edit list with tape clipped to it to the A/P person assigned to review your work. They will review for correct Due date, Dept. and Account coding, PO #'s, dollar amount, invoice date, correct vendor, descriptions and mark any necessary corrections on the Edit list.
- 9 After receiving the batch back, check the Edit list for any corrections that need to be made and when they have been completed mark OK or other note as needed on the list.
- 10 Once any necessary corrections have been made, go to the Batch A/P screen and highlight your batch. At the top left of the screen click on Actions, Release & Post, say Yes.
- 11 When that has been done, go into the Batch Log Spreadsheet located under the H drive/Forms/Batch Log. You will enter the date, your initials, batch #, total # of invoices and the dollar amount from the batch.
- 12 Invoices are now kept separate from the Batch Edit list and can be filed if the previous week's checks have already been processed. Filing is done alphabetically, with the check vendors in front of the lettered tab and the EFT vendors in back of the tab.

