



St. Johns Co. Emergency Rental Assistance (SJC ERA) Program Design

October 13, 2023

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The St. Johns County Emergency Rental Assistance program (SJC ERA) will amend the policies and procedures detailed in the Program Design as needed to ensure efficient program management and grant distribution in full compliance with U.S. Treasury ERA Guidelines.

ROLES

Program Design, Terms & Conditions	
St. Johns County	<ul style="list-style-type: none"> A. Assist with outreach and public notice efforts in coordination with Capital Access B. Provide link on County’s website and Human Services website to Capital Access Project and Grants Management Systems (CAPGEMS) St. Johns County Emergency Rental Assistance (SJC ERA) website and Registration C. Assign representatives from Housing and/or Human Services to serve as active members of “St. Johns Co. ERA Coordination Team” to support marketing, production, payments, reporting and messaging and resolve issues D. Review and decide on policy and Program Design update recommendations from CAPGEMS E. Establish clear and efficient process for review and processing of invoices to establish County confidence in CAPGEMS adherence to compliance and finance rules F. Human Services is lead point of contact for SJC ERA
CAPGEMS	<ul style="list-style-type: none"> A. Contracted Professional Service Provider to St. Johns County for program administration in compliance with US Treasury and St. Johns County rules, terms and conditions. B. Overall Program Administration and Coordination with County, stakeholders, and Partners C. Marketing and Outreach: <ul style="list-style-type: none"> 1. Website 2. Customer service phone and email 3. Social Media: Facebook page, Twitter Handle 4. Direct marketing flyers and calls to property managers, employers, houses of worship, food banks, etc. D. Assistance with completing Applications via Zoom and/or phone E. Outreach and coordination with utilities for optimal efficient process to access Past due balances F. Outreach and coordination with St. Johns County for access to data feeds for Duplication of Benefits Analysis G. Outreach and coordination to cultivate landlords and utilities to provide verification documentation in a timely manner H. Production oversight and support I. Applicant Issue Resolution

Subject to St. Johns County approval

Program Design, Terms & Conditions	
	J. Direct Payments to Housing and Utilities Payees, and/or to Applicants when necessary
CAPGEMS	<p>Administration:</p> <p>K. Advise on Program Design, Compliance and Award Criteria to efficiently distribute funds in compliance with Treasury Guidelines.</p> <p>L. Overall Program Production and Coordination with County, stakeholders, and Partners</p> <p>Production:</p> <p>M. Manage production: application eligibility, compliance and verification reviews, Duplication Of Benefits (DOB) analysis, award calculation, grant agreement generation and grant funding and reporting.</p> <p>N. Operate and maintain CAPGEMS, the system of record</p> <p>O. Program Verification Review Sheet to accommodate:</p> <ul style="list-style-type: none"> ▪ Collection of Compliance Data and documents ▪ Income Verification ▪ Past due Rent and/or Utilities ▪ Duplication of Benefits Analysis ▪ Calculation of Unmet Need and Grant Award Amount <p>P. Customize HubSpot Customer Relationship Management system to track Applicant and Payee activities and communications</p> <p>Q. Custom design and testing of online Applicant and Landlord portals, where applicants and Payees upload verification documents</p> <p>R. Provide Case Managers who help applicants, property manager and utilities provide required verification and Payment documentation and conduct compliance reviews and award calculations</p> <p>S. Provide Quality Control Managers who conduct QC reviews for compliance prior to disposition (grant or fail) of each processed application</p> <p>T. Generate each grant agreement, signed by Applicant, then signed by Capital Access.</p> <p>U. Generate Production and Expenditure Reports</p> <p>V. Provide backup documentation for invoices for reimbursement invoice submissions</p> <p>W. Support with Applicant Issue Resolution</p>

PERFORMANCE ACCOUNTABILITY

Program Design, Terms & Conditions	
Coordination and Communication	<p>The SJC ERA Coordination Team plays a vital role to promote a sense of collaboration, identify issues, coordinate deployment of resources, and solve problems fast to help support achievement of the Production Goals within the funding deadline. This is a Key Factor for Success. The Coordination Team consists of representatives with decision-making authority from:</p> <ul style="list-style-type: none"> ▪ SJC Health and Human Services ▪ Capital Access Senior Staff <p>Coordination Team meets weekly to:</p> <ol style="list-style-type: none"> 1. Review Production and Expenditure Reporting 2. Identify and Resolve Issues as they arise 3. Confer and determine program refinements: “Learn as we go.”

FUNDING

Treasury ERA 2	
Total Original Allocation	\$ 6,323,658.40
Total Allocation Received (Tranche 1)	\$ 2,529,463.00
Maximum Admin 15%	\$ 379,419.45
Minimum Available for Grants	\$ 2,150,043.55

Production & Expenditure Goals	<p>ERA2:</p> <p>By the end of March 2024, the SJC ERA Team expects to have obligated 100% of all available ERA2 funds allocated by Treasury.</p> <p>The SJC ERA Team is engaged in an Affirmative Marketing program to cultivate quality applications for low and moderate-income renters who reflect the range of diversity in St. Johns County, especially demographic groups hit hard by the public health and economic disruption effects of COVID.</p>
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GRANT ASSISTANCE

Applicant Eligibility	<ul style="list-style-type: none"> ▪ Primary Residency in St. Johns County, FL ▪ Household income at or below 80% AMI ▪ At least one household member has qualified for unemployment benefits or provides self-certification of disruption and/or loss of income and/or for ERA2 incurred significant costs, or experience other financial hardship due to or during COVID. ▪ One or more individuals within the household can for ERA2 demonstrate and/or attest to a risk of experiencing homelessness or housing instability
Assistance Type	Grant with “claw back” provisions for repayment if evidence of fraud, waste and/or violation of program rules
Eligible Uses	<p>The ERA2 Period of Performance ends on September 30, 2025. No ERA2 funds may be obligated after that date.</p> <p>Payment for rent and/or utilities is limited to a maximum of 18 months of total assistance, no earlier than April 1, 2020, inclusive of all previous ERA funds awarded, including SJC ERA1 and Our Florida grants.</p> <p>ERA2 funds are used by the program to fund first-time and subsequent applications.</p> <p>Eligible Uses:</p> <p>Rent, not to exceed 18 months assistance inclusive of all ERA assistance, including SJC ERA1 and Our Florida grants.</p> <ul style="list-style-type: none"> ▪ In arrears, including reasonable late fees/penalties, no earlier than April 1, 2020 ▪ Future, up to 3 months <p>Utilities (electric, gas, water/sewer, heating oil, propane, garbage) registered with the program, not included in rent, and not to exceed 18 months assistance inclusive of all ERA assistance, including SJC ERA1 and Our Florida grants.</p> <ul style="list-style-type: none"> ▪ In arrears, including reasonable late fees/penalties, no earlier than April 1, 2020 ▪ Deposit required of an applicant to establish utility account. <p>Per Treasury FAQ #27, the program may provide rent assistance for applications that are renting their residence under a “rent-to-own” agreement, under which the renter has the option (or obligation) to purchase the property at the end of the lease term, provided that a member of his or her household:</p> <ul style="list-style-type: none"> ▪ is not a signer or co-signer to the mortgage on the property; ▪ does not hold the deed or title to the property; and ▪ has not exercised the option to purchase. <p>Up to three months future rent assistance is granted to applicants regardless of the end date of the lease, based on this certification</p>

	<p>in the Landlord Affidavit: “To the extent the lease would otherwise expire, including month-to-month arrangements, the Landlord hereby agrees that the lease term is extended to the end of the period for which assistance has been granted.” The exception is when the applicant indicates they intend to move prior to end of the future three months, in which case assistance is provided only through the end of the tenancy.</p>
<p>Alternative Housing Services</p>	<p>A. Stability Services:</p> <ul style="list-style-type: none"> ▪ SJC ERA does not provide Stability Services. <p>B. Internet:</p> <ul style="list-style-type: none"> ▪ Applicants are informed during the Application and Case Management processes that they can apply to the Affordable Connectivity Program of the Federal Communications Commission https://www.fcc.gov/acp. ▪ Referring Applicants to the FCC’s ACP program: a) avoids potential Duplication of Benefits issues with the FCC’s program, b) speeds Application processing (less documentation and less time trying to decipher the Internet portion of a bundled billing statement), and c) speeds application processing.
<p>Grant Term</p>	<p>The last day of the last month for which assistance is provided is end of the grant term.</p> <p>For rent and/or utility grants, the maximum term is based on unmet need.</p> <p>Maximum Term for ERA2:</p> <ul style="list-style-type: none"> ▪ Up to 18 months of total assistance, inclusive of any ERA funds awarded, including SJC ERA1 and Our Florida, and which may include up to 3 future months rent with every application. <p>The months for which assistance is provided are not required to be consecutive.</p>
<p>Eviction Pause</p>	<p>By signing the Landlord Affidavit, a landlord agrees not to evict the tenant for non-payment of rent:</p> <ul style="list-style-type: none"> ▪ First-time applications: two months after the last day for which the Applicant’s rent is paid by the program. ▪ Subsequent applications: one month after the last day for which the Applicant’s rent is paid by the program.
<p>Duplication of Benefits Warning</p>	<p>The following Fraud Warning is part of many Applicant and Landlord documents and their portals:</p> <p>A “Duplication of Benefits” (DOB) occurs when a person or household receives federal assistance from multiple sources for the same purpose. Some may call DOB double-dipping of subsidy. This is prohibited by federal law. All Emergency Rental Assistance programs are federally funded.</p> <p>An example of DOB is an applicant or household who already received rent assistance for January and February 2022 from another source, such as Our Florida, and applies for and receives rent assistance for those same months from SJC ERA. (Please note: It is NOT a DOB if the applicant or household already received rent assistance for January and February 2022 from Our Florida, SJC ERA, or other sources and applies for and receives rent assistance for different months than already received.)</p>

	<p>For Applicants, the warning continues:</p> <p>Any applicant for SJC ERA who applies for assistance for the same month(s) that has already been provided by any Emergency Rental Assistance program for the same month(s) will be committing fraud. If duplicated funds have been paid, SJC ERA will refer the case to the SJC Office of the Inspector General, SJC Sheriff’s office, and to the U.S. Treasury Department for potential criminal prosecution.</p> <p>For Landlords, the warning continues:</p> <p>If you receive rent assistance from SJC ERA for any month(s) that has already been paid by another program, such as Our Florida, you are required to repay the duplicated month(s) to SJC ERA immediately. Failure to do so is a violation of federal law. SJC ERA will refer any failure to return duplicated benefits, or any other suspected fraudulent activity to the SJC Office of the Inspector General, the SJC Sheriff’s office, and to the U.S. Treasury Department for potential criminal prosecution.</p>																
<p>Repayment by the Payee</p>	<p>None, except when:</p> <ul style="list-style-type: none"> ▪ Duplication of benefits. The amount of duplicated benefits is sought for repayment. ▪ Fraud and/or abuse. Up to the entire amount of the award may be sought for repayment, depending on the circumstances. ▪ Future rent is paid, and the applicant vacates the premises for any reason (autonomous decision, eviction, unit no longer habitable, etc.). Only whole months of “unused” future rent is sought from the payee for repayment. 																
<p>Disbursement</p>	<p>To expedite expenditure of funds, Past-due and future assistance are funded concurrently. For example:</p> <table border="1" data-bbox="726 906 1621 1114"> <thead> <tr> <th>Assistance Type</th> <th>Months</th> <th>Monthly Rent</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Past Due Rent:</td> <td>2</td> <td>\$1,200</td> <td>\$2,400</td> </tr> <tr> <td>Future ERA Need:</td> <td>3</td> <td>\$1,200</td> <td>\$3,600</td> </tr> <tr> <td>TOTAL ERA Grant:</td> <td>5</td> <td></td> <td>\$6,000</td> </tr> </tbody> </table> <p>Capital Access issues payments to rental payees via Deluxe E-check and to utility Payees with their choice of ACH direct deposit or Deluxe E-check shortly after Grant Agreement is signed by the applicant and the Program.</p>	Assistance Type	Months	Monthly Rent	Total	Past Due Rent:	2	\$1,200	\$2,400	Future ERA Need:	3	\$1,200	\$3,600	TOTAL ERA Grant:	5		\$6,000
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CUSTOMER SERVICE

<p>Purpose and Goals:</p>	<p>To provide customer service to help applicants with questions and requests related to:</p> <ol style="list-style-type: none"> 1. How to complete the SJC ERA Registration and/or Application
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	<ol style="list-style-type: none"> 2. Respond to eligibility questions and provide referrals to resources 3. Provide access to language translation services 4. Refer applicants to Care Connect Plus at 904-819-3070 for Stability Services, including re-housing and transitional housing. <p>Provide coverage of phone, email and text requests so that responses are delivered within 24 hours of messages.</p>
<p>Approach:</p>	<p>Provide customer service phone line 904-204-8989, info@sjc-era.com and SJC-ERA.com website.</p> <p>Provide live call center services beginning the date that registration opens to the public until the call volume no longer warrants live coverage. For phone calls, when all agents are busy and after hours, applicants may leave a voicemail.</p> <p>Staff are assigned to check emails, texts and phone messages and reply within 24 hours, and during the same day when possible.</p> <p>The phone system tracks metrics for all incoming and outgoing calls and reports are available as needed.</p> <p>Customer Service SOP, script and answers to FAQs are in place.</p>
<p>Deliverables:</p>	<ul style="list-style-type: none"> ▪ Phone line with greetings will be live no later than the date that Registration opens to the public. ▪ Staffing Plan ▪ FAQ Script for calls, emails, and text messages ▪ Call Log
<p>Customer Service Center:</p>	<p>Applicants may call 904-204-8989 or email info@sjc-era.com with questions and inquiries about the SJC ERA program.</p> <p>The phone line is staffed weekdays from 9:00 AM to 5:00 PM. SJC ERA team members log into the VoIP during their scheduled shifts to answer calls. All applicants are treated with respect and correspondence is courteous.</p> <p>All voicemails and emails are returned either during or after their shift depending on the call volume. All messages are returned within 24-hours, most on the same day.</p>
<p>Translation Service Requests:</p>	<p>Given the diverse population of St. Johns County, there will be applicants with limited English proficiency. These residents are encouraged to call the SJC ERA phone line to arrange for translation service. The caller ID function collects the incoming phone number if the message cannot be deciphered.</p>

APPLICATIONS

<p>Prioritization</p>	<p>Application priority is preliminarily determined by information submitted in the Registration step (for subsequent applications the Expression of Interest is equivalent to Registration for first-time applications), and is finalized as Part of the Verification Review. The SJC ERA website specifies all prioritization criteria.</p> <p>Priority determines an application’s order of processing. It has no bearing on the amount of assistance provided.</p> <p>Priority 1: (any of the following are true)</p> <ul style="list-style-type: none"> ▪ Household Income is 50% or less of AMI ▪ Household with at least 1 person unemployed who has an active claim with a state Office of Unemployment for at least the 90 days prior to date of Registration with this Program; ▪ Household facing eviction (with a St. Johns County court case number) for the reason of non-payment of rent. ▪ Household with any member age 60 or older and/or minors at the time of application. <p>Priority 2. Applicants who earn 50% to 80% AMI and who do not meet any Priority 1 criteria.</p> <p>Priority 1 for household income and/or 90-day unemployment are mandatory by federal statute. Non-federal prioritization may be modified based on program experience to help ensure equitable and fair processing of Applications.</p>
<p>Program Registration Program Registration (cont'd)</p>	<p>Applicants complete Registration online (or have completed in person by the County, Capital Access or a community Partner on their behalf) to determine whether they Pass preliminary threshold criteria, and if successful, their priority status. (For subsequent applications, registration is referred to as the “Expression of Interest” or EOI. See “Subsequent Applications” below.) Registrations and EOIs also establish applicants’ place in the queue.</p> <p>Completed Registrations are automatically assigned a unique Application Identification and are set up in HubSpot for customer relationship management and activity tracking. Completed EOIs are automatically assigned an Application ID, with “-2” as a suffix to their original Application ID.</p> <p>Data collected in the Registration:</p> <ol style="list-style-type: none"> 1. Applicant Name 2. Applicant email address (will also be verified). 3. Applicant phone number 4. Language 5. Rental property address 6. Utility name and account number 7. Primary Applicant’s demographics (income, gender, race, ethnicity, veteran, date of birth) 8. Landlord/Property Manager name, address, phone, email. <p>Threshold Criteria collected in the Registration step:</p>

	<ul style="list-style-type: none"> ▪ Rental property address is located in the County. ▪ Applicant household has suffered income loss and/or disruption during or due to Covid-19 ▪ Applicant household income is no more than 80% AMI for household size.
<p>Full Application</p>	<p>Full Applications are by invitation to Applicants who submitted Registrations/Expressions of Interest and have met the Program’s threshold eligibility criteria. The Full Application is the same for first-time and subsequent applications. In the Full Application Applicants provide detailed information about:</p> <ul style="list-style-type: none"> ▪ Household demographics ▪ Income ▪ Rent ▪ Utilities on SJC ERA’s list of registered utilities, that are not included in rent. ▪ Potentially Duplicating Benefits <p>Customer Service staff are available to assist Applicants who have questions about submitting their Full Application.</p> <p>All Applications are submitted to CAPGEMS online.</p>
<p>Signed Applicant Attestations</p>	<p>The Full Application includes a comprehensive set of Applicant “Attestations,” and Representations and Warranties which covers the compliance criteria as described in the ERA Frequently Asked Questions from the U.S. Treasury Department.</p>
<p>Verification Documentation Requirements</p>	<p>CAPGEMS saves all documentation received for an application in the Digital File Cabinet.</p> <p>CAPGEMS Case Managers work with Applicants, Landlords and/or Utility Companies to obtain the following.</p> <p>Applicant:</p> <p>Up to three (3) attempts are made to collect verification documents from the applicant.</p> <ol style="list-style-type: none"> 1. Identification for the primary Applicant that is not expired: <ol style="list-style-type: none"> i. Driver License ii. State Identification Card iii. Passport iv. Military I.D. v. Other Government Issued Photo ID <ul style="list-style-type: none"> ▪ If the ID has no address, or the address does not match the application, one of the following matching the applicant’s name and address in the application must also be provided:

<p>Verification Documentation Requirements (cont'd)</p>	<ul style="list-style-type: none"> - Utility, Internet, Phone or other bill - Bank Statement - Vehicle Registration <ol style="list-style-type: none"> 2. Evidence of Disruption, Loss of Income and Related Hardship, for ERA2 during the COVID Crisis (unemployment benefit statement, since March 13, 2020, for any household member). Attestation suffices if none provided. 3. Evidence of Income: Census tract data in combination with self-attestation of income; Categorical Eligibility along with self-attestation of income; copy of 2022 1040 form(s); or evidence of current income (Pay Stubs, Unemployment documentation, Social Security statement, etc.) received in the past 30 days. 4. Evidence of Eligible Residency – Lease (current, signed by Applicant and Landlord/Agent, identifies unit where applicant resides, establishes rent amount). Or, third-party bills/documents/statements that have the name of a household member and match the address in the application are acceptable (for utility, cable, phone, credit card, bank, benefit program, automobile registration, etc.). Or, an “Occupancy Agreement” or the equivalent for a short-term rental (weekly, for example) is acceptable. 5. Evidence of Risk of Housing Instability: Past due utility bill or rent notice/account statement, or eviction notice. Attestation suffices if none provided. 6. Evidence of Past-Due Housing Charges, if any, from Applicant. 7. Evidence of Past-Due Utilities, if any, from applicant: <ol style="list-style-type: none"> i. Current statement for each Applicant-paid Past-due utility supplying electric, gas, water/sewer, heating oil, propane, garbage. (Utilities included under lease are considered Rent.) The utility bill must be for the same rental unit as the Application. It is preferred if the account is in the name of the Primary Applicant or a household member, but not required due to the variety of circumstances that frequently lead to an account in the name of a non-household member. ii. Utility bills provided, if any, are the basis for calculating the utility grant. If a utility provides account data directly to the program, that data will be the basis for calculating the utility grant, whether or not the applicant provides a utility bill. <p>Landlord:</p> <p>Up to three (3) attempts are made to collect verification documents from the landlord.</p> <ol style="list-style-type: none"> 1. Landlord Affidavit: lease terms, Past due rent and consent to follow grant agreement terms 2. W-9 3. Government-issued photo identification 4. Only when fraud is suspected and if any of the following will help to clarify the case: <ul style="list-style-type: none"> ▪ Proof of ownership (Deed, property tax bill) ▪ Property Management Agreement
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	<p>The Landlord Affidavit is unique to each Applicant, and is always requested. (See Unresponsive Landlord section for when the Landlord Affidavit is not received.)</p> <p>Utility: Each utility provides their W-9 and ACH payment authorization (if they choose ACH payment rather than Deluxe E-check).</p>
<p>Household Income Verification</p>	<p>The Program reserves the option, for each applicant, to use a range of income verification benchmarks and determination methods pursuant to the current guidance from Treasury, including annual or monthly income, using HUD’s definition of “annual income” in 24 CFR 5.609 or 2022 IRS Form 1040 methodology. Alternatively, the program may rely on:</p> <ul style="list-style-type: none"> ▪ Fact-Specific Proxy data of median income for the applicant’s census tract in combination with applicant attestation; or ▪ Categorical Eligibility with evidence of qualification in SNAP, TANF, Medicaid or LIHEAP. <p>Self-attestation of income without appropriate census tract data or categorical eligibility documentation is not permitted.</p> <p>Income that is verified from monthly income is subject to redetermination as set forth in Treasury guidance.</p> <p>For subsequent applications (only when the previously funded application was processed by Capital Access – see Subsequent Applications below), the case manager asks the applicant:</p> <ol style="list-style-type: none"> 1. Has the household composition changed since the first application? 2. Has household income changed substantially since the first application? <p>If the answer to both questions is “No”, and because subsequent applications are funded only from ERA2, per Treasury guidance in the 8/25/2021 FAQ #4, if a household is a single family that the program determined met the income requirement for eligibility under ERA1, the program considers the household to be eligible under ERA2, unless the program becomes aware of any reason the household does not meet the requirements for ERA2.</p> <p>If the answer to either question is “Yes” income for the subsequent application is determined by the same methodology as for a first-time application.</p> <p>Any of the following satisfy all income documentation needs for household members age 18 or older who have income:</p> <ol style="list-style-type: none"> 1. Fact-Specific Proxy. Median income of applicant’s census tract, along with an applicant attestation for income. 2. 2022 IRS Form 1040(s), W-2(s) 3. Categorical Eligibility. Eligibility letter or proof of receiving benefits from Florida since January 1, 2020 for any of the following programs: <ul style="list-style-type: none"> ▪ SNAP - Department of Children and Families ▪ TANF - Department of Children and Families

<p>Household Income Verification (cont'd)</p>	<ul style="list-style-type: none"> ▪ Medicaid - Department of Children and Families ▪ LIHEAP – Department of Commerce <p>4. Documentation for current income, including but not limited to Pay stubs, benefit statements, child support.</p> <p>“Fact-Specific Proxy”: Per Treasury FAQ #4, the program may rely on a written attestation from the applicant as to household income if the grantee also uses any reasonable fact-specific proxy for household income, such as reliance on data regarding average incomes in the household’s geographic area.</p> <ul style="list-style-type: none"> ▪ If the applicant lives in census tract where more than 50% of the residents are below 80% AMI per HUD Low-Mod Income Summary Data, AND the applicant attests to household income no greater than 50% of AMI for the household size, the application is deemed income-eligible for the program and is Priority 1 based on income. ▪ If the applicant does not live in a census tract where at least 50% of the residents are below 80% AMI, or if income data cannot be determined by census tract, the Program attempts to collect income verification documentation for the Household from the Applicant to satisfy method 2, 3 or 4 above. <p>In any of the above situations, documentation may also be requested if fraud is suspected.</p> <p>CMs and QCs follow the “Household Income” Job Aid as Part of the Verification Review.</p> <p>Gross income is counted for all Household members aged 18 or older who have income and are not in high school full-time, as provided by the applicant.</p>
<p>Subsequent Applications</p>	<p>An applicant who is past the grant term of the previous SJC ERA assistance is eligible for additional assistance. This happens by way of a Subsequent Application.</p> <ul style="list-style-type: none"> ▪ If the most recent assistance was not provided with SJC ERA2 funds managed by Capital Access, the applicant registers and applies the same way as a first-time applicant. See “Program Registration” and “Full Application” above. ▪ If the most recent assistance was provided with SJC ERA2 funds by Capital Access, the following process applies. <p>When the most recent previous assistance was provided with SJC ERA2 funds by Capital Access, the following applies:</p> <p>Submitting Expression of Interest (EOI)</p> <p>The first step in applying for subsequent assistance is for the applicant to submit an “Expression of Interest” (EOI) through their Applicant Portal. This is equivalent to first-time applicants Registering with the program.</p> <p>Any applicant who is Past their last month of SJC ERA assistance from their previous application is able to submit an EOI from their portal.</p>

	<p>When an EOI is submitted, this establishes the applicant’s initial place in the processing queue, comprised of all other first-time and subsequent applicants. When the application reaches the front of the line, the program sends an email to the applicant inviting them to their Applicant Portal to submit a full application.</p> <p>Prioritization</p> <p>The program assigns the same priority status the application had for its first funding unless the household’s employment and/or income status have changed since their previous application.</p> <p>Expedited Processing</p> <p>Among other questions, the EOI determines if the applicant is facing eviction and has a case number.</p> <p>If yes, or if other extenuating circumstances come to the attention of a Program Lead, the case is deemed highly time sensitive. As expeditiously as possible, the program sends the invitation to submit a full application.</p> <p>If neither are true, the applicant retains their place in the queue.</p>
<p>Risk of Housing Instability or Homelessness Determination</p>	<p>Documentation to demonstrate that a household is at risk of housing instability or homelessness includes:</p> <ul style="list-style-type: none"> ▪ Past-due rent bill or statement ▪ Eviction notice ▪ Past-due utility bill or statement <p>For ERA2, in the absence of documentation listed above, the program relies on an attestation in the application that the household is at risk of housing instability or homelessness.</p>
<p>Applicant Death</p>	<p>When an applicant dies during application processing and prior to funding, the application is failed. The new head of household is welcome to submit a new application. The program will make efforts to expedite the review of the new application, if any.</p>
<p>Security and Privacy</p>	<p>All information is highly secure in the CAPGEMS Digital Filing Cabinet, and it serves as a firewall. All Application verification, compliance, award calculation, grant agreement, Payment information and communications documentation is uploaded and retained in the CAPGEMS Digital File Cabinet.</p> <p>Only designated Capital Access and St. Johns County staff can access applicant files with secured usernames and Passwords.</p> <p>All CAPGEMS staff are trained to protect Personally Identifiable Information (PII). PII is not emailed or texted by program staff. All information collected and retained by the program is used solely for the purposes of determining applicant eligibility and award amounts, and for reporting required by U.S. Treasury and the Pennsylvania Department of Human Services.</p>

APPLICATION PROCESSING

<p>Determine Application Priority</p>	<p>Registrations and Expressions of Interest are assigned Priority 1 or Priority 2 based on the answers provided by each Applicant. Priority status is confirmed during Verification Review, and changed when necessary.</p>
<p>Threshold Review</p>	<p><u>Part I – Registration and Expression of Interest Threshold Review</u></p> <p>Each week the Program Lead or designee selects Registrations/Expressions of Interest for Threshold Review in the following order until the weekly quota is reached:</p> <ul style="list-style-type: none"> 1st-time application, Priority 1 2nd-time Priority 1 3rd-time Priority 1 1st-time P2 2nd-time P2 3rd-time P2. <p>Quality Control Managers conduct Threshold Reviews:</p> <ol style="list-style-type: none"> 1. Determine whether an Applicant Passes or fails the threshold eligibility criteria questions: <ol style="list-style-type: none"> i. Household suffered disruption and/or income loss due to or during COVID Pandemic. ii. Household income no greater than 80% AMI for family size. iii. Household at risk of homelessness or housing insecurity. iv. Rental address is within the County borders. 2. Change the “Application Status” of reviewed Registrations: <ol style="list-style-type: none"> i. Ineligible Applicants are changed to the status of “QC Application Failed Review.” This automatically generates and “Ineligible” email to the Applicant. ii. Successful Applicants are changed to the status of “Proceed: Threshold Met.” This automatically generates First-Contact emails to the Applicant. <p>This procedure helps CAPGEMS to:</p> <ul style="list-style-type: none"> ▪ Continually identify new Priority 1 Applicants as they complete their Registration/Expression of Interest, and ▪ Avoids delays in Full Application processing. <p>Accepting Full Applications only when their processing can begin within one week:</p> <ul style="list-style-type: none"> ▪ Helps to manage Applicant expectations about when they will be served ▪ Results in Application data and documentation that is current.

<p>Initial Emails to Applicant and Landlord</p>	<p>An email to the Applicant, is triggered by the Applicant passing the Threshold Eligibility Review.</p> <ul style="list-style-type: none"> ▪ The "Invitation to Submit Full Application" email to Applicant includes a unique link to the Applicant's Full Application and document upload and status Portal. The email lists the verification documents for the Applicant to provide, instructions for uploading them, and contact information (email and phone) for assistance. ▪ This is counted as the first of a maximum of three attempts to contact the applicant. <p>An email to the Landlord is triggered by the Applicant submitting their Full Application.</p> <ul style="list-style-type: none"> ▪ The email includes a unique link to the Landlord's document upload Portal. The email requests the Landlord complete the online Landlord Affidavit form and upload a filled W-9. It includes instructions for uploading, and contact information (email and phone) for assistance. ▪ This is counted as the first of a maximum of three attempts to contact the applicant.
<p>Verification Review</p>	<p><u>Part II – Case Managers Conduct Compliance Reviews and Obtain Verification Documents:</u></p> <ol style="list-style-type: none"> 1. Set up Verification Review Sheet. For subsequent applications this includes indicating for which months the applicant received assistance for rent, utility 1, utility 2 and utility 3, as applicable. This is critical for ensuring that an applicant receives no more than the maximum allowed months of assistance, across all funded applications. 2. Conduct verification and compliance review of application: Determine if submitted verification documents meet requirements, establish requested rental and/or utility assistance, and identify issues and follow-up items such as potential duplicating benefits and Household income. 3. When needed, make second and third (final) attempts to obtain missing verification documents from the Applicant. These attempts may be by email, text and/or phone. 4. Conduct a Duplication of Benefits analysis for rent and for utilities, based on information from the Applicant, their DOB Attestation, and any rent and utility assistance data provided by SJC's HMIS Data Feed. 5. Review documents submitted and request clarifications as needed 6. Determine award amounts for rent and utilities, as applicable. 7. Change Eligibility Status to "Pass Confident" or "Fail...". Change Applicant Outreach and Payee Outreach Statuses to the appropriate setting for the case. Change the Detailed Status to "Ready for QC Review." <p>Applicants must provide documentation within 72 hours. The process is:</p> <ol style="list-style-type: none"> 1. CM or Document Expediter will contact each applicant we hope to process to let them know: 2. They must provide all needed documentation within 72 hours. 3. Document upload assistance is available. 4. If sufficient documentation not uploaded within 72 hours, we will skip the applicant, and return to them later if funds remain.

	<p>Duplication of Benefits: The Case Manager uses DOB documentation from applicants, SJC ERA1 data, the county’s HMIS, and if available, from the Our Florida ERA program, to determine if there is a potential DOB. For a month where other assistance was already received, no ERA assistance will be provided unless a documented balance remains for that month.</p>
<p>Determining Rent Award Amount</p>	<p>If the program receives neither the lease nor the Landlord Affidavit, no rent award is made. If either or both are received, proceed:</p> <ol style="list-style-type: none"> 1. CM determines the “Last Month of Arrears” for the current application: <ul style="list-style-type: none"> ▪ The month the Landlord Affidavit is submitted is considered the “Last Month of Arrears.” ▪ If the landlord is unresponsive and there is no Landlord Affidavit, the month that the application is submitted is considered the Last Month of Arrears, and the CM follows the “Unresponsive Landlord” section below. 2. CM determines the amount of rent based on data from lease, Landlord Affidavit, rental account ledger, or Past-due notice. All fees associated with monthly rent, if any, are counted as rent, including but not limited to Admin fee, Pet fee, Month-to-month fee, Bad credit fee. Late fees and penalties, within reason, associated with non-payment of rent are included in the award calculation. 3. CM uses the data from the Landlord Affidavit to determine Past-due months, unless there is reason to believe that the application data regarding Past-due rent is more accurate. Total rent due is entered in each past-due month, less any amounts already paid by the applicant or other rent assistance, not to exceed 15 months for ERA2. 4. If months of assistance remain after covering arrears, CM adds 3 months of future rent to the award. The exception is: <ul style="list-style-type: none"> ▪ When an applicant informs the program they intend to vacate prior to three future months, in which case the future amount is for only the month(s) of intended residency. In this case, more than 15 months of arrears may be granted with total assistance not to exceed 18 months. <p>The total rent award is the sum of past-due and any future months of rent.</p>
<p>Determining Utility Award Amounts</p>	<p>Past-Due Utilities:</p> <ol style="list-style-type: none"> 1. The same “Last Month of Arrears” is used for utilities as is used for rent (see “Determining Rent Award Amount 1. above). 2. The entire utility is paid in the Last Month of Arrears. If the bill is \$3,000 or more, consult the program lead. 3. For heating oil or propane, the program will Pay for one fill of the tank per calendar year. The entire cost of the most recent delivery is placed in the Last Month of Arrears for that utility. <p>Future Utilities:</p> <ul style="list-style-type: none"> ▪ No future utilities are paid. <p>Utility Deposit if required to restart a utility that had been shut off for non-payment: The program will Pay the deposit amount indicated in the utility documentation. The entire amount will be placed in the current month on the Verification Review Sheet.</p> <p>In a case where an applicant utility bill shows a credit balance: no utility award is made.</p>

<p>Unresponsive / Uncooperative Landlords</p>	<p>When an Applicant is working with the Case Manager, but the Landlord is unresponsive or uncooperative (as described below), the following procedures shall apply.</p> <p>SJC ERA determines the landlord is unresponsive or non-participatory when either of the following occur:</p> <ul style="list-style-type: none"> ▪ At least three attempts by at least two methods of communication (phone, text, or e-mail) over a five calendar-day period have been made to request the landlord’s Participation; or ▪ A landlord confirms in writing or verbally that the landlord does not wish to Participate. <p>All outreach attempts and notices to the landlord are documented.</p> <p>Risk and Risk Reduction Measures:</p> <p>The program is aware of the greater potential for fraud when making a rent award without the participation of the landlord. In addition to standard precautions, the following measures are taken to guard against fraud in these situations:</p> <ol style="list-style-type: none"> 1. A search is done in the County’s real estate ownership records as an anti-fraud measure, to verify that the applicant’s address is a rental property to the best of our understanding. https://qpublic.schneidercorp.com/Application.aspx?App=StJohnsCountyFL&Layer=Parcels&PageType=Search 2. A fully executed lease must be provided by the applicant that clearly shows the name and address of the landlord who will receive rent Payments, along with monthly rent, lease term, and utilities that are included in rent, if any. Without a fully executed lease, no rent award will be made. 3. One attempt is made and documented to verbally obtain confirmation from the landlord of past-due and monthly rent and other applicant information even if landlord will not execute documentation. <p>Process for Calculating Rent Award:</p> <ol style="list-style-type: none"> 1. CM conducts standard Rent Award calculation for past-due amount, relying on rent information provided in the Application and the applicant’s Attestation. 2. Future rent is included for up 3 months (not to exceed 18 months of total assistance), or to the end of the lease, whichever is shorter. 3. Standard QC review is conducted. <p>Rent Payee Determination:</p> <ul style="list-style-type: none"> ▪ To the landlord, unless unresponsive, then ▪ To the applicant.
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<p>Unresponsive Applicant</p>	<p>An applicant is determined to be unresponsive in either of the following circumstances:</p> <ul style="list-style-type: none"> ▪ When an application status is changed to “Proceed: Threshold Met” the applicant is invited to submit a full application. After 3 attempts to contact, by at least two methods of communication (email, text, phone) over at least 7 days from the date of the invitation without receiving a completed application and required documentation, the application is considered Unresponsive, and the case is Closed. ▪ After the full application is submitted, if the applicant fails to provide requested documentation after three attempts to collect it. <p>Unresponsive cases may be reinstated upon request by the applicant. Upon request by the applicant, the file will be reactivated for 3 days for that applicant to provide the missing documentation. If not received within 3 days, the case is failed.</p> <p>In all cases, and even when the applicant provides all needed documentation, the CM and applicant must have some form of 2-way communication, or the case is failed.</p>
<p>“Stale” Applications</p>	<p>If a full application is more than 45 days old, the application is considered stale. The Case Manager informs the applicant that a new application and current rent and utility documentation are needed to be considered for assistance.</p>
<p>Fraud Detection</p>	<p>There is a delicate balance between providing assistance to as many eligible applicants as quickly as possible, and the time-consuming activities of conducting deeper due diligence than required by the ERA guidelines in the effort to be good stewards of public funds. This policy takes the approach of always being watchful for signs of fraud, waste and/or abuse, and minimizing the time spent on cases where potential criminal activity is suspected.</p> <p>Rental Fraud Detection in the Verification Review Process:</p> <p>Case Managers (“CM”) take the following steps during every verification review process to provide assurance that the landlord is legitimate:</p> <ol style="list-style-type: none"> 1. Search County Property Record to: <ul style="list-style-type: none"> ▪ Confirm ownership. Is the owner’s name in the County’s records the same as on the Lease, Landlord Affidavit and/or W-9? ▪ Compare tenure of ownership in the County’s records with the statement in the Landlord Affidavit and the date the lease was signed. Are there discrepancies? 2. Guiding Questions for Fraud Detection: <p>CMs and Quality Control Managers (“QC”) are mindful of the following indications of potential fraud.</p> <p>Is the application for rent only? We have found in certain instances fraudulent actors prefer to only ask for rent assistance</p>

<p>Fraud Detection (cont'd)</p>	<p>because it is easier to fabricate documentation than with the utilities.</p> <p>Does the property owner on record with the County appear to have no relationship with information on the Landlord Registration, Landlord Affidavit, and/or W-9?</p> <p>Is there a pattern whereby certain data such as listed below are the same for the applicant and the landlord?</p> <ol style="list-style-type: none"> a. Property Address b. Last name c. Email d. Phone <p>Is there a discrepancy between the amount of rent charged, the size of the rental unit, and the number of people in the household?</p> <p>Other Potential Warning Signs:</p> <ul style="list-style-type: none"> ▪ A pattern of potentially fraudulent activities that connect one or more applications ▪ Collusion between an applicant and a landlord ▪ Applicant appears to impersonate a landlord, or vice versa in an attempt to appear as separate entities. <p>Actions when fraud is suspected:</p> <ol style="list-style-type: none"> 1. If any verification documents appear to have been altered from the original, the application is failed. 2. When reviewing verification documents there is reason to believe an identification card is fake or was stolen, the application is failed. Additionally, the case is referred to the SJC Inspector General. <p>The remaining approach is to identify discrepancies, put the application on hold until/unless the applicant and/or landlord can provide satisfactory clarification information. If satisfied, application processing continues. If not satisfied, the application is failed.</p> <ol style="list-style-type: none"> 3. The CM consults with the QC Manager about the analysis. <ul style="list-style-type: none"> ▪ If fraud is suspected in the Landlord/Property Manager role, the CM requests any of the following from the Landlord/Property Manager if the document(s) will address concerns: <ol style="list-style-type: none"> iii. Proof of ownership – for example, deed or property tax bill. iv. Property Management Agreement ▪ If fraud is suspected due to high rent amount or collusion between an applicant and a landlord, CM requests any of the following from the applicant or the landlord if the document(s) will address the concerns: <ol style="list-style-type: none"> i. Proof of rent Payment such as a bank statement, money order, or canceled check. If it is the landlord's bank statement, it must show deposit of funds. If it is the tenant's documentation, it must show withdrawal of rent. ii. Proof of residency with one of the following: Vehicle registration, utility bill such as cell phone, internet,
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<p>Fraud Detection (cont'd)</p>	<p>television, or credit card or bank statement showing address of property from at least 90 days ago.</p> <p>iii. Waits 24 hours for a response if a voicemail message was left.</p> <p>4. If a rational explanation for the discrepancies is provided, the CM proceeds with application verification review</p> <p>5. If there is not a rational explanation, or if the applicant and/or landlord fails to make contact, the CM recommends failing the application</p> <p>Referrals to Law Enforcement:</p> <p>CAPGEMS staff may refer an application or related applications to the St. Johns County Inspector General, and U.S. Treasury when Production Leads, QCs, CMs and/or Customer service staff identify probable fraud.</p> <p>CAPGEMS staff will refer to the St. Johns County Inspector General and the SJC Sheriff:</p> <ul style="list-style-type: none"> ▪ Instances of check fraud and attempted check fraud; ▪ A pattern of related applications that are likely fraudulent; ▪ Applications that are likely fraudulent that have already been paid. <p>CAPGEMS gives the County prompt notice of any referrals to law enforcement.</p> <p>CAPGEMS Staff keeps a record of communications with law enforcement and PNC Bank Fraud Prevention Services.</p>
<p>Fraud Warning</p>	<p>The following Fraud Warning is part of many Applicant and Landlord documents and their portals.</p> <p>The mission of SJC ERA is to help tenants who are experiencing housing instability with rent and utility assistance as they recover from the disruption and loss during the COVID pandemic. The SJC ERA Program team seeks to serve as many qualified applicants as feasible with the limited funds on hand.</p> <p>There is no charge to apply to SJC ERA. No one has been authorized to collect any fee for assisting with applying to the program.</p> <p>Fraud delays our ability to serve people in need. If we identify any information that indicates a pattern of fraud, waste and/or abuse, we will reject the application. We will send you a notice detailing the discrepancies and giving you an opportunity to update your data and documentation to remedy the issues. If your updated data and documentation address the discrepancies, we will proceed with processing your application.</p> <p>Fraud with ERA is a state and federal offense. If we identify fraudulent behavior, we will notify the St. Johns County District Attorney, and US Treasury, for investigation and if necessary, prosecution of criminal behavior.</p> <p>SJC ERA may pursue legal avenues which could result in fines and jail. SJC ERA will make all documentation and communication records available to law enforcement.</p>

<p>Special Ownership Situations</p>	<p>Applicant LLC or Corporation: An applicant who is renting from their own LLC or corporation is ineligible for assistance.</p> <p>Applicant Trustee or Beneficiary: When an applicant is a trustee or beneficiary of an estate or a trust that owns the applicant’s rental unit, the application fails due to the increased risk that an award to the applicant might be a conflict of interest and they would be unduly enriched by the award.</p> <p>Sublease: In a sublease situation, the entity that signs the applicant’s lease is the landlord of record.</p> <p>Foreclosure: If owner involved in the application no longer has title to the property, the process pauses because the foreclosure nullifies any lease. To be eligible for assistance, the new landlord must enter into a lease with the applicant. If not provided, the case is failed.</p> <p>If the foreclosure is not complete (the owner of the unit in the application still has title), the process continues, but only Past-due rent and utilities are paid. No future rent or utilities are provided.</p>
<p>Sale of Rental Property</p>	<p>When a rental receiving assistance from the program is sold, the selling landlord must notify the program immediately of the date of sale, the new owners contact information, and whether the existing leases are transferring to the new owner.</p> <p>Return of Unused Future Rent:</p> <p>When a rental property is sold and it is the intent of the seller and the buyer for the buyer to inherit a vacant property, the program attempts to communicate with the seller and the buyer for return of unused future rent. If it is not returned within 14 days of the demand notice, the case is referred to the District Attorney.</p>
<p>Abusive Applicant</p>	<p>When an applicant behaves in a belligerent, combative, threatening, menacing or otherwise abusive manner toward program staff, whether verbally or in writing, staff:</p> <ol style="list-style-type: none"> 1. Politely and firmly states that the behavior is inappropriate and the case is being referred to a manager. 2. Ends the conversation, letting applicant know their manager will contact after 2 days. 3. Documents the interaction in CAPGEMS. 4. Refers the case to a Program Lead for appropriate next steps. <p>A Program Lead takes over any remaining case management and quality control tasks, and takes one or more actions from the following non-exhaustive list, depending on the specifics of the situation:</p> <ul style="list-style-type: none"> ▪ Fails an active application if applicant continues bad behavior with Program Lead ▪ Continues an active application if sufficient documentation has already been provided by the applicant. ▪ Ceases all future communication if the application has already been funded. ▪ In extreme cases, alerts the County and appropriate authorities

<p>Applicant Withdrawal</p>	<p>If at any point during Application processing, an Applicant indicates they do not wish to Participate in the Program, their Application Status is changed to “Withdrawal.” They are sent an Ineligible email notification, which is saved in the digital filing cabinet.</p> <p>An Applicant who has withdrawn an application may submit a new Application if later they decide they would like assistance.</p>
<p>Quality Control Review</p>	<p><u>Part III – Quality Control Reviews and Generation of Grant Agreements:</u></p> <ol style="list-style-type: none"> 1. A Quality Control Manager reviews each Application with one of four possible outcomes: <ol style="list-style-type: none"> a. Pass. Grant Agreement is generated. Process proceeds to Part III Step B. b. Address Open Items. Application returned to Case Manager to obtain clarification and/or documentation from Applicant. c. Assistance Denied. Application is ineligible or there is no unmet need. Send appropriate email. Case processing ends. d. Withdrawn Applicant (see above). Case processing ends. 2. For outcome of Pass, QC Manager confirms: <ol style="list-style-type: none"> a. The months of assistance for each Payee, including up to 3 months future rent when applicable. b. The award amount for each Payee c. The total grant amount.
<p>Total Grant Amount for the Application</p>	<p>The total grant amount for the Application is the verified, eligible and approved sum of:</p> <ol style="list-style-type: none"> 1. Past-due rent 2. Future rent 3. Past-due utility, for up to three eligible, tenant-paid utilities. <p>Late fees and penalties, within reason, are paid by the program.</p>
<p>Grant Agreement</p>	<p>The Grant Agreement is prepared and transmitted by email for electronic signatures, using PandaDoc.</p> <ol style="list-style-type: none"> 1. QC Manager prepares the Grant Agreement and emails it to the Applicant for electronic signature. 2. The applicant is emailed weekly automatic reminders, and Customer Service calls or texts the applicant at least one time, reminding the applicant to sign. The Grant Agreement expires after 30 days if not fully executed and the QC fails the application. The process is ended unless the applicant contacts the program, in which case the Grant Agreement is revived. 3. Applicant signs and submits the Grant Agreement. 4. QC Manager (the same who sent the Grant Agreement in Step 1) receives the Grant Agreement signed by the Applicant, and signs and dates the document. 5. Fully executed Grant Agreement moves on to Payment Processing. <p>Every applicant may go to their Applicant Portal at any time to view the status of the Payments. The statuses relating to Payment are</p>

	“Agreement Signed by Applicant,” “Agreement Signed by Funder,” and “Application Funded.”
Stipulated Order of Dismissal	The Stipulated Order of Agreement (“Stipulation Agreement”) is a document intended to protect applicants from eviction when a court case has been filed to evict the tenant for the reason of non-payment of rent. It is electronically signed, using PandaDoc, by the Applicant and the Landlord/Property Manager. It states that the Landlord/Property Manager agrees to withdraw all eviction actions against the applicant’s household, if any, in order to receive SJC ERA funding. The document is required before funding any application, whether or not there is an SJC court case number for eviction.
Making Award Payments	<p>Upon receipt of:</p> <ol style="list-style-type: none"> 1. Grant agreement signed by Applicant and authorized Capital Access Signatory 2. Landlord/Property Manager Payee Submission of IRS W-9 3. If the Employer Identification Number (EIN) provided during Registration is different from that provided on the W-9, the W-9 number is used, and Finance remains vigilant for signs of fraud. 4. Receipt of Utility Payment instructions, if applicable, <p>Then Capital Access:</p> <ol style="list-style-type: none"> 5. Generates Payment via Deluxe E-check emailed to landlord (or to applicant if landlord is unresponsive). <ul style="list-style-type: none"> ▪ If a payee is challenged by the process of downloading and printing a Deluxe E-check, as a means of last resort only, arrangements can be made with the program to pick up a paper check, by appointment only. The payee must show a photo ID. 6. Generates Payment to utilities via ACH direct deposit or by check, as preferred by each utility. 7. Tracks when Payments are deposited.
Funds Returned to the Program	<p>The program requires rent funds to be returned when future rent has been paid and the applicant vacates the rental before the month through which rent has been paid. Only rent for entirely unused months must be returned.</p> <p>When any returned funds are received by Capital Access, the Director of Finance redeposits them into the ERA account to use for future grants.</p> <p>Returned funds are not Program Income.</p>
IRS 1099 Forms	Capital Access will prepare and distribute an end of tax year IRS 1099 form for each utility and landlord for the total amount of assistance provided to their customers and tenants, respectively. 1099 forms are not sent to applicants who directly receive rent grants due to unresponsive landlords, because a) the applicant sends those funds to the landlord, and b) ERA grants are not taxable to applicants.

APPLICANT APPEALS

<p>Appeals</p>	<p>Applicants are informed during Registration, in writing, of their right to appeal. All denial of service, termination of service, and award decisions by the Program are provided in writing to the Applicant, including:</p> <ol style="list-style-type: none"> 1. The action being taken; 2. The reason for the action; 3. The effective date of the action; and, <p>Applicants filing an appeal can obtain a SJC ERA Appeal Form from their Applicant Portal or Case Manager. The form includes:</p> <ul style="list-style-type: none"> ▪ Date of Appeal ▪ SJC ERA Application ID# ▪ Email Address ▪ Name ▪ Mailing Address ▪ The SJC ERA decision they are appealing ▪ Date of the SJC ERA decision ▪ A complete and concise reason for the appeal ▪ Documentation to support their claim, if any. <p>Program guidance from the U.S. Department of Treasury may not be appealed, nor may the policies and procedures of SJC ERA.</p> <p>Landlords may not appeal a SJC ERA decision.</p> <p>Appeals are submitted to:</p> <ul style="list-style-type: none"> ▪ Appeals@sjc-era.com <p>St. Johns County will provide the applicant with a written decision within 10 business days of receipt of the appeal. SJC staff will also enter appeal tracking information in the applicants file in CAPGEMS.</p>
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CONFLICT OF INTEREST

<p>Conflict of Interest:</p>	<p>A. SJC ERA permits a CAPGEMS worker on the SJC ERA project to apply for SJC ERA assistance, with the following agreement signed by the CAPGEMS worker:</p> <ul style="list-style-type: none"> ▪ Affiliate shall not access her application via CAPGEMS or other tools that are only available to her by merit of her employment with the Program, ▪ Affiliate shall make all reasonable effort to not use her experience and understanding of the Program to elicit more
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	<p>benefits than any other applicant would be eligible to receive,</p> <ul style="list-style-type: none"> ▪ Affiliate’s application shall not overly rely on self-certification, and ▪ Affiliate’s application shall be processed by a program Lead. <p>Final approval/denial is made by the County.</p> <p>B. SJC ERA permits a St. Johns County worker with duties related to the operation or management of SJC ERA to be a beneficiary of SJC ERA assistance only if the worker has no role in:</p> <ul style="list-style-type: none"> ▪ Assessing the eligibility of applications, ▪ Determining award amounts, ▪ Approving applications for funding. <p>Per the Grantee Award Terms with U.S. Treasury, in any case where a CAPGEMS or St. Johns County worker associated with SJC ERA is an applicant for SJC ERA funding, the program will:</p> <ul style="list-style-type: none"> ▪ For CAPGEMS worker: Disclose in writing to Treasury and to Pennsylvania DHS the potential appearance of a conflict of interest for the named worker, and the statement indicated A. above, signed by the worker/applicant. ▪ For St. Johns County worker: Disclose in writing to Treasury and to Pennsylvania DHS the potential appearance of a conflict of interest for the named worker, and a statement indicating that worker/applicant is in compliance with the conditions of B. above.
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COMPLIANCE WITH FEDERAL CIVIL RIGHTS STATUTES AND REGULATIONS

<p>Compliance with Federal Civil Rights Statutes and Regulations:</p>	<p>SJC ERA complies with federal civil rights statutes and regulations, including Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, the Fair Housing Act (Title VIII of the Civil Rights Act of 1968), and the Americans with Disabilities Act of 1990, as outlined in the ERA1 Award Terms it accepted.</p> <p>SJC ERA also provides meaningful access to the program for limited English proficiency (LEP) individuals. The online application can be translated to any of the languages supported by Google Translate. Applicants who prefer Spanish are assigned to a Spanish-speaking Case Manager. For other languages, real-time translation services are available for Case Management meetings.</p>
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REPORTING

<p>Reporting</p>	<p>U.S. Treasury Department: Capital Access provides data to the County required by Treasury following most current Treasury reporting guidance, and using Treasury report templates. The County is responsible for using the Treasury portal to answer all questions and provide all data and files required to submit reports.</p> <ul style="list-style-type: none"> ▪ Quarterly reports for ERA2. Due on the 15th of month following end of the quarter. <p>When the 15th of the month is on a weekend or holiday, the reports are due the following business day.</p>
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Subject to St. Johns County approval

RECORD RETENTION

Maintenance of and Access to Records	<p>In compliance with the Award Terms:</p> <ul style="list-style-type: none">▪ The Treasury Office of Inspector General, the Government Accountability Office or their authorized representatives, shall have the right of access to SJC ERA records (electronic and otherwise) in order to conduct audits or other investigations.▪ Records shall be maintained by Recipient for a period of five (5) years after all funds have been expended or returned to Treasury. <p>Records are maintained electronically in the CAPGEMS Digital Filing Cabinet.</p>
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