

*Pinellas County/City of St. Petersburg*

# **COVID-19 Emergency Rental Assistance**

## **Policies and Procedures Manual**

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## Preface

This manual provides the policies and procedures of Pinellas County and the City of St. Petersburg (City) in its administration of Emergency Rental Assistance (ERA) funds through the Consolidated Appropriations Act (CAA), 2021, Pub. L. No. 116-260. This document provides standard concepts, definitions, and procedures that enable Pinellas County/City program personnel to understand and effectively administer the program. This manual is a tool for staff to use as a reference and resource. This manual will be updated regularly to reflect changes in policies and procedures as well as new regulations, notices, and other guidance.

Per the guidance provided by the U.S. Department of the Treasury (U.S. Treasury), this manual, at a minimum, must address the following:

- Policies and procedures for determining a household's eligibility for the ERA program
- Policies and procedures for determining the prioritization of households in compliance with the statute
- Policies and procedures for maintaining program records
- Policies and procedures regarding the circumstances under which to accept applications without documentation
- Policies and procedures to prevent fraud
- Validation or fraud prevention procedures
- Controls to maintain compliance with the policies and procedures

## 1 Policies

This section of the *Pinellas County/City of St. Petersburg Emergency Rental Assistance (ERA) Program Policies and Procedures Manual* provides the overarching policies of the program. These policies are derived from the following source documents:

- 501(a) of Division N of the Consolidated Appropriations Act (CCA), 2021, Pub. L. No. 116-260 (Dec. 27, 2020)
- U.S. Department of the Treasury Emergency Rental Assistance Grantee Award Terms
- U.S. Department of the Treasury Emergency Rental Assistance Frequently Asked Questions, Revised March 26, 2021.

If the U.S. Treasury releases additional guidance related to the ERA program, the new guidance will be referenced in the previous list, and this manual may be updated to reflect program changes.

Federal regulations applicable to this grant program include, without limitation, the following:

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 C.F.R. Part 200, other than such provisions as Treasury may determine are inapplicable to this award and subject to such exceptions as may be otherwise provided by Treasury. Subpart F – Audit Requirements of the Uniform Guidance, implementing the Single Audit Act, shall apply to this award.
- Universal Identifier and System for Award Management (SAM), 2 C.F.R. Part 25 and pursuant to which the award term set forth in Appendix A to 2 C.F.R. Part 25 is hereby incorporated by reference.

- Reporting Subaward and Executive Compensation Information, 2 C.F.R. Part 170, pursuant to which the award term set forth in Appendix A to 2 C.F.R. Part 170 is hereby incorporated by reference.
- OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Non procurement), 2 C.F.R. Part 180 (including the requirement to include a term or condition in all lower tier covered transactions (contracts and subcontracts described in 2 C.F.R. Part 180, subpart B) that the award is subject to 2 C.F.R. Part 180 and Treasury’s implementing regulation at 31 C.F.R. Part 19.v.Recipient Integrity and Performance Matters, pursuant to which the award term set forth in 2 C.F.R. Part 200, Appendix XII to Part 200 is hereby incorporated by reference.
- Governmentwide Requirements for Drug-Free Workplace, 31 C.F.R. Part 20.
- New Restrictions on Lobbying, 31 C.F.R. Part 21.

Statutes and regulations prohibiting discrimination applicable to this grant program include, without limitation, the following:

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d et seq.) and Treasury’s implementing regulations at 31 C.F.R. Part 22, which prohibit discrimination on the grounds of race, color, or national origin under programs or activities receiving federal financial assistance.
- Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794), which prohibits discrimination on the basis of handicap under any program or activity receiving or benefitting from federal assistance.
- The Fair Housing Act, Title VIII-IX of the Civil Rights Act of 1968 (42 U.S.C. § 3601 et seq.), which prohibits discrimination in housing on the basis of race, color, national origin, sex, familial status, or disability;
- The Age Discrimination Act of 1975, as amended (42 U.S.C. §§ 6101 et seq.) and Treasury’s implementing regulations at 31 C.F.R. Part 23, which prohibit discrimination on the basis of age in programs or activities receiving federal financial assistance.
- The Americans with Disabilities Act of 1990, as amended (42 U.S.C. §§ 12101 et seq.), which prohibits discrimination on the basis of disability under programs, activities, and services provided or made available by state and local governments or instrumentalities or agencies thereto.

For simplicity, the term “applicant” used throughout this document is the tenant applicant unless otherwise stated as “landlord applicant.”

Pinellas County/City includes Pinellas County and City of St. Petersburg personnel and contractor, Pinellas County/City subcontractor, and other partnering agency personnel who are administering the Pinellas County/City ERA program. All program personnel are grouped under “Pinellas County/City” for simplicity in Section 1: Policies. Section 2: Procedures specifies which staff members are responsible for conducting specific tasks.

## 1.1 General Provisions

The COVID-19 ERA program makes available \$21,421,218.80 provided directly to Pinellas County through the CAA and administered by the U.S. Treasury. Funds are to assist households that are unable to pay rent and utilities due to the COVID-19 pandemic. Pinellas County will aid income-eligible households located outside the City of St. Petersburg but within the geographical boundaries of Pinellas County that are at risk of experiencing homelessness or housing instability due to the COVID-19 pandemic. The Pinellas County application portal will also host the City of St. Petersburg, which has received a separate allocation of \$8,012,455.90. The programs are based on separate U.S. Treasury Grantee Awards and will be administered separately using the same application intake process and policies and procedures

The ERA program allows for up to 12 months of total assistance. This can be all arrears payments, prospective payments, or a combination of both. The statute does not prohibit the enrollment of households for only prospective benefits. Section 501(c)(2)(B)(iii) of Division N of the Act does provide that if an applicant has rental arrears, Pinellas County/City may not make commitments for prospective rent payments unless it has also provided assistance to reduce the rental arrears.

Utilities and home energy costs are separately stated charges related to the occupancy of rental property. Accordingly, utilities include separately stated electricity, gas, water and sewer, trash removal, and energy costs, such as fuel oil. Utilities that are covered by the landlord within rent will be treated as rent.

The ERA program can include assistance for other expenses related to housing incurred due, directly or indirectly, to the COVID-19 pandemic. These expenses include relocation expenses, which may include rental security deposits, and rental fees, which may include application or screening fees, if a household has been temporarily or permanently displaced due to the COVID-19 outbreak; and reasonable accrued late fees (if not included in rental or utility arrears and if incurred due to COVID-19)

In emergency situations where a qualifying rental household is required to relocate from prior rental unit after submitting an application for ERA Program assistance, the tenant may still qualify for aid from the ERA Program. Examples may include scenarios where a renter household has been evicted, received a notice to vacate or nonrenewal notice. Qualified applicants in these scenarios are eligible for assistance with rent arrears as well as three months of future rental assistance in accordance with program policies. Assistance may be inclusive of other expenses related to housing, such as relocation expenses (including prospective relocation expenses), rental security deposits, and rental fees, which may include application or screening fees. Upon approval, the tenant will receive a Certification of Eligibility letter and referral to wrap-around services that can assist with housing stability. Based on tenant's request, arrears payments will be provided to prior landlord to relieve the rental debt on tenant's rental history and help the renter household establish and maintain stable housing. Upon entering a new rental agreement, Pinellas County/City will pay up to three months' rent directly to the current landlord up to the maximum total of 12 months' rent. Documentation of the tenant receiving funds in these emergency situations will be captured in the audit log. To recertify for any additional months of ERA Program benefits (up to the cumulative maximum 12 months' rent), the tenant must be living in a unit and provide a copy of a current rental agreement.

At least 90% of the funds received by Pinellas County/City will be used for the following needs:

- i. Rental payments
- ii. Rental arrears payments
- iii. Utilities and home energy arrears payments (in case of shut off notice)
- iv. Other expenses related to housing incurred directly or indirectly due to the pandemic

The remaining funds may be used for the administrative costs of the program as well as housing stability services, including case management or other services intended to keep households stably housed. To supplement this, other funding sources have been identified to support housing stability services in coordination with the Pinellas County/City ERA Program.

Given the challenges presented by the COVID-19 pandemic, the U.S. Treasury has granted the Pinellas County/City flexibility as to the particular form of documentation required, including permitting photocopies or digital photographs of documents, e-mails, or self-attestations from employers, landlords, caseworkers, or others with knowledge of the household's circumstances. Pinellas County/City must require all applications for assistance to include a self-attestation from the applicant that all information included is correct and complete.

The ERA program relies on participation from both the service provider (i.e., landlord, utility provider, other service provider) and the tenant. Pinellas County/City will obtain information from the service provider through the application process and make payments on behalf of the tenant.

Payments will be made by Pinellas County/City directly to the respective service provider (i.e., landlord, utility provider, or other service provider) on behalf of the applicant. Emergency rental assistance will not be paid directly to households except in limited cases where the service provider does not agree to participate in the program.

The U.S. Treasury directs that the Pinellas County/City must make reasonable efforts to obtain the cooperation of service providers to accept payments from the ERA program. Outreach will be considered complete if:

- a request for participation is sent in writing, by certified mail, to the service providers, and the addressee does not respond to the request within 7 calendar days after mailing; or
- if the grantee has made at least three attempts by phone or e-mail over a 5 calendar-day period to request the service provider's participation; or
- a service provider confirms in writing that the service provider does not wish to participate.

Pinellas County/City will document outreach to the service provider. After all reasonable efforts have failed to obtain cooperation of the service provider or the service provider does not wish to participate, Pinellas County/City may consider making payments directly to the household, depending on the specific circumstances of the case. Such determinations are made by staff assigned to review appeals and documented in the case audit log.

## 1.2 Eligibility

Pinellas County/City may only use the funds provided in the ERA to provide assistance to eligible renter households. To be eligible, a household must be obligated to pay rent on a residential dwelling in Pinellas County and Pinellas County/City must determine that:

- i. one or more individuals within the household has qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the COVID-19 outbreak;
- ii. one or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability; and
- iii. the household has a household income at or below 80% of area median income.
- iv. If the household is located within the City of St. Petersburg, the applicant may still enter through Pinellas County's portal, but will be funded through the City's allocation.

The following sections describe the information and documentation Pinellas County/City will collect to verify the applicant is eligible for the program. The information and documentation will be captured using software with electronic forms for applicants to input data and upload documentation.

### 1.2.1 Economic Hardship from COVID-19

To be eligible for the program, the applicant must demonstrate an economic hardship from COVID-19. Pinellas County/City must document that one or more members of the applicant's household either:

- i. qualified for unemployment benefits; or
- ii. experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the COVID-19 outbreak.

In addition to the written self-attestation, Pinellas County/City will require applicants to provide ONE of the following as evidence of economic hardship:

- Relevant documentation during the eligible pandemic period (after March 13, 2020). Examples might include:
  - A copy of household member(s) notification of job loss/termination from employer
  - A copy of household member(s) notification of furlough from employer
  - A copy of household member(s) notification confirming reduction in hours and/or pay
  - A copy of household member(s) application and/or approval for Unemployment Insurance benefits
  - Documentation that includes the name of the household member who is self-employed, the name and nature of the business, and evidence of economic impact on self-employment
  - Documentation of sickness with COVID-19 or caring for a household or family member who is sick with COVID-19 resulting in economic hardship
  - Documentation of extraordinary out-of-pocket childcare expenses due to school closures, medical expenses, or health care expenditures stemming from COVID-19 infection of the applicant or a member of the applicant's household who is or has been ill with COVID-19
  - Documentation of compliance with a recommendation from a government health authority to stay home, self-quarantine, or avoid congregating with others resulting in economic hardship
  - Documentation of any additional factors relevant to the tenant's reduction in income as a result of the COVID-19 emergency

If an applicant is unable to provide such documentation, the applicant will describe why they are unable to provide the supporting documentation and complete the Affidavit of Risk of Housing Instability and Financial Impacts from COVID-19.

### 1.2.2 Risk of Homelessness

Pinellas County/City must document that one or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability, which may include:

- (i) a past due utility or rent notice or eviction notice;
- (ii) unsafe or unhealthy living conditions; or
- (iii) any other evidence of risk, as determined by the Pinellas County/City.

Pinellas County/City will require applicants to provide ONE of the following **to verify risk of homelessness or housing instability**:

- Past due utility bill or cut off notice
- Past due rent notice or eviction notice
- Relevant documentation of code enforcement finding of unsafe, unhealthy, or unstable living conditions during the eligible pandemic period (after March 13, 2020).
- Other verifiable documentation of unsafe, unhealthy, or unstable living conditions during the eligible pandemic period (after March 13, 2020) (e.g. evidence of housing costs exceeding 30% of household income)

If an applicant is unable to provide such documentation, the applicant will describe why they are unable to provide the supporting documentation and complete the Affidavit of Risk of Housing Instability and

Financial Impacts from COVID-19. Documentation provided to verify household income and rental amount will be considered sufficient to meet this requirement if rent exceeds 30% of household income.

### 1.2.3 Income Verification

The Act provides that Pinellas County/City may determine income eligibility based on either:

- (i) the household’s adjusted gross income for calendar year 2020; or
- (ii) sufficient confirmation of the household’s monthly income at the time of application, as determined by the Secretary of the Treasury.

Pinellas County/City will require applicants to provide ONE or more of the following to verify income (in order of preference):

- A copy of the household’s Form 1040 Tax Return for all adult household members as filed with the IRS for calendar year 2020. With the IRS Form 1040 the applicant must include proof of submission to the IRS. If no such documentation is available to verify the IRS Form 1040, the applicant must use an alternative method of income verification, as outlined in this section;
- Wage documentation (two earning statements or one earning statement showing year-to-date earnings), interest statement, unemployment compensation for each adult household member (if this form of income documentation is provided, eligibility for assistance will be reassessed every three months for the entire time period during which assistance is provided);
- Categorical eligibility: determination letter from another government agency that verifies the applicant’s household income;
- Household member(s) with no income will provide bank statement for the previous two months. If member(s) has no bank account, they will complete an Affidavit for Proof of Income.
- **Under limited circumstances**, Pinellas County/City may rely on other written documentation (e.g., attestation from a caseworker or other professional with knowledge of a household’s circumstances to certify that an applicant’s household income qualifies for assistance). If an attestation without further documentation is relied upon, eligibility for assistance will be reassessed every three months for the entire time period during which assistance is provided.

The following table provides the 2021 maximum total household income limits, effective April 1, 2021, for Pinellas County

**Table 1 – Area Median Income Limits**

| <b>Family Size</b> | <b>50% of Median Income</b> | <b>80% of Median Income</b> |
|--------------------|-----------------------------|-----------------------------|
| 1                  | \$25,850                    | \$41,350                    |
| 2                  | \$29,550                    | \$47,250                    |
| 3                  | \$33,250                    | \$53,150                    |
| 4                  | \$36,900                    | \$59,050                    |
| 5                  | \$39,900                    | \$63,800                    |
| 6                  | \$42,850                    | \$68,500                    |
| 7                  | \$45,800                    | \$73,250                    |
| 8                  | \$48,750                    | \$77,950                    |

Data Source: <https://www.huduser.gov/portal/datasets/il/il2021/2021summary.odn>

Applicants may use the method of income verification mentioned above that is advantageous to the applicant in pursuit of eligibility, depending on their circumstances. In some cases, applicants may not

qualify based on their 2020 Form 1040 income, but subsequently became income eligible due to the effects of COVID 19.

#### 1.2.4 Applicant and Household Members Verification

To process the application, deter fraud, and conduct a duplication of benefits check, Pinellas County/City must obtain additional information about the applicant and the household members. This includes contact information to communicate with the applicant regarding the application. The Act also requires Pinellas County/City to attempt to obtain demographic information about each applicant, including gender, race, and ethnicity.

Pinellas County/City will require applicants to provide ALL of the following information to confirm the identity of the applicant, co-applicant (if applicable), and household members:

- Government-issued identification for the applicant, co-applicant (if applicable), and all household members (Florida Driver's License, Florida ID Card, birth certificate, social security card, or green card);
  - ID for minors may include documentation on tax returns, school records, birth certificate, or social security card.
- Electronic form completed by the applicant indicating the total number of household members and the social security number of each household member;
- Electronic form completed by the applicant indicating name, contact information, and co-applicant (if applicable);
- Electronic form completed by the applicant indicating the gender, race, and ethnicity of household members (applicants may refuse to answer); and
- Self-attestation from the applicant that the household information is accurate and complete.

**NOTE:** Application preparers are persons that participate/assist in the preparation and submission of the ERA program application for tenants but are not part of tenant's household. The definition also extends to those that assist others in preparing or performing support services in connection with ERAP Applications as well as volunteer preparers that collaborate with Pinellas County/City, assisting tenants with the preparation and submission of the ERA program application and incorporate the required documentation provided by the tenant.

Pinellas County/City will require Preparers to provide ALL of the following information:

- Name, Telephone Number, Email, and acknowledged Preparer Statement

#### 1.2.5 Occupancy Verification

Pinellas County/City must obtain, if available, a current rental agreement, signed by the applicant and the landlord or sublessor that identifies the unit where the applicant resides and establishes the rental payment amount.

If a household does not have a signed rental agreement, documentation of residence may include evidence of paying utilities for the residential unit, an attestation by a landlord who can be identified as the verified owner or management agent of the unit, or other reasonable documentation as determined by the grantee.

In the absence of a signed rental agreement, evidence of the amount of a rental payment may include bank statements, check stubs, or other documentation that reasonably establishes a pattern of paying rent, a written attestation by a landlord who can be verified as the legitimate owner or management agent

of the unit, or other reasonable documentation as defined by the Pinellas County/City. Absent a signed rental agreement, qualifying applicants may be awarded up to three months prospective rent. Any additional months of assistance will require a signed rental agreement to be in place.

Pinellas County/City will require applicants to provide ONE of the following to verify the rental agreement:

- Applicable current rental agreement or agreements, signed by the tenant and the landlord or sublessor, that includes the unit where the applicant resides, terms of lease and rental payment amount and any fees for which assistance is requested; or
- Evidence of paying utilities for the residential unit and an attestation by a landlord who can be identified as the verified owner or management agent of the unit; or
- Evidence of paying rent and an attestation by a landlord who can be identified as the verified owner or management agent of the unit.

### 1.2.6 Rental Assistance Verification

Pinellas County/City will provide arrears and prospective rental payments as part of the program. Prospective rental payments will be based on the rate indicated in the most current rental agreement. Any rent due will be considered arrears on or after the 10<sup>th</sup> of the current month. Partial payments made by the tenant will be applied to the earliest rent arrears. In the event the applicant cannot provide a rental agreement or other documentation as per 1.2.5 above due to legitimate reasons (as determined by Pinellas County/City), and provides tenant and landlord attestations, the lesser of the attested-to rental rate or HUD's Fair Market Rental Rate (website - [huduser.gov](http://huduser.gov)) shall be utilized in order to determine the appropriate allocation amount of funds.

Except in limited cases where the landlord does not wish to participate in the Program, Pinellas County/City will obtain ALL of the following information from landlords to process the application and payments:

- Landlord's W-9;
- Monthly ledger and/or other financial records from the landlord indicating the tenant's contact information, rental arrears and non-variable fees included in lease, excluding rent check fees, pet fees, or any other cost deemed to be ineligible according to Pinellas County/City, for the program period (March 13, 2020 to present). Ledgers from tenants in easily altered formats such as Word and Excel are not acceptable forms of documentation, although such documentation may be accepted if provided directly by the landlord;
- Electronic form completed by the applicant with the landlord's contact information, including e-mail address;
- Attestation from the landlord that payments received from the Pinellas County/City ERA program will be used to satisfy the tenant's rental obligations to the owner;
- Attestation from the landlord disclosing any directly received assistance specific to that household; and
- A completed Pinellas County/City Landlord Acknowledgement Form.
- Landlords or their representatives who choose not to or are prohibited from completing an application but who have provided a valid W-9 and any necessary documentation to substantiate relationship between payee and legal owner of the property, will be paid directly.
- Pinellas County/City will contact the landlord as outlined in 1.1, if the landlord refuses to participate or there is no response to the outreach after five (5) days, the tenant may be paid directly.

Pinellas County/City will obtain ALL of the following information from applicants to process the application and payments:

- Electronic form completed by the applicant with amount of arrears and prospective rental payments requested (not to exceed 3 months of prospective payments and not to exceed 12 months total of arrears and prospective payments).

### 1.2.7 Utilities Assistance Verification

As part of the program, Pinellas County/City will provide payments for utilities in cases where a shut-off notice has been issued. Past due utility bills with a statement date more than 30 days prior to when the payment recommendation is provided to Pinellas County/City, will require follow-up to request updated bill and confirm the amount owed prior to payment being issued. Utilities payments will be made directly to utility providers on behalf of the applicant.

Pinellas County/City will obtain ALL of the following information from utility providers to process the application and payments:

- Utility provider's W-9;
- Utility provider's contact information, including e-mail address; and
- Utility provider's point of contact to coordinate with directly on arrears payments.

Pinellas County/City will obtain ALL of the following information from applicants to process the application and payments:

- Bill, invoice, or evidence of payment from applicant for each month of utilities assistance requested; and
- Electronic form completed by the applicant with amount of arrears utility payments requested (not to exceed 12 months total of arrears payments).

### 1.2.8 Duplication of Benefits Verification

Pursuant to the Act, when providing ERA assistance, Pinellas County/City must review the household's income and sources of assistance to confirm that the ERA assistance does not duplicate any other assistance, including federal, state, or local assistance provided for the same costs.

Pinellas County/City may rely on a self-attestation from the applicant regarding non-duplication with other government assistance in providing assistance to a household. Communities with overlapping or contiguous jurisdictions are particularly encouraged to coordinate and participate in joint administrative solutions to meet this requirement.

Pinellas County/City will compare data from the other federal rental assistance funding programs to determine if duplication of benefits occurs. Pinellas County/City will compare its ERA program application data to the following data sets:

| <b>Data Set</b>                                | <b>Coordinating Agency</b>              | <b>Point of Contact</b> |
|--|---|-------------------------|
| City of St. Petersburg Financial Assistance    | City of St. Petersburg                  | Lynn Farr               |
| City of Largo                                  | City of Largo                           | Arrow Woodward          |
| City of Clearwater                             | City of Clearwater                      | Kara Grande             |
| State Housing CRF                              | Pinellas County                         | Sherilyn Harris         |
| CARES Individual & Family Financial Assistance | Pinellas County and 211 Tampa Bay Cares | Joe Riddle              |

Pinellas County/City will obtain ALL of the following information from applicants as part of the application process to conduct a duplication of benefits check:

- Applicant’s information as stated above in Applicant and Household Verification;
- Self-attestation from the applicant with the amount of previous assistance received;
- Self-attestation from the applicant that the information is accurate and complete; and
- Documentation of previous benefits received for rental assistance, if available.

Pinellas County/City will conduct a duplication of benefits verification as detailed in Section 2: Procedures of this manual. This includes:

- Evaluating applications with a Duplication of Benefits Calculation Worksheet that is built into the application software system; and
- Maintaining records of Agreement for Assistance, Duplication of Benefits Calculation Worksheet, Applicant Duplication of Benefits Statement, and applicable supporting documentation regarding other assistance received or anticipated in each applicant file.

### 1.3 Prioritizing Households

Renter households that qualify as very low income (less than 50% AMI) and/or households in which one or more members is currently unemployed and has been unemployed for at least 90 days prior to the application will be given priority for funding. Once applications have been reviewed and are ready for approval by Pinellas County/City, the program will disburse funds on a rolling basis. At the time of disbursement, recipients that are very low income and/or households in which one or more member has been unemployed for at least the last 90 days will have their funds disbursed first. Remaining funds will then be disbursed to remaining qualified applicants.

To accomplish the prioritization goals of the program, Pinellas County/City has established the following process for funding approved applications.

Applications submitted to the software system will be assigned a score based on cumulative points awarded based on the priorities of the program:

- 5 points for households that include an individual who is currently unemployed and has been unemployed for the 90 days prior to application
- 5 points for households with income at or below 50 percent of the area median income
- 0 point for all other applications

Once submitted, applications are assigned for review in order of cumulative points awarded, then by date submitted.

Reviewers will evaluate cases with the highest points first, in order of when the application was submitted.

Applications that are pending payment approval will be organized into two categories:

1. Group 1 – Households that include an individual who is currently unemployed and has been unemployed for the 90 days prior to application, and households with income at or below 50 percent of the area median income
2. Group 2 – All other applications

Operations Manager will review a payment recommendation report at least weekly that includes a batch file of applications that have been reviewed and are recommended for payment. The applications will be sorted by:

1. Group 1 applications in order of the date the application was submitted
2. Group 2 applications in order of the date the application was submitted

The payment recommendations report will also include the following analysis in a narrative cover sheet:

- The total number of group 1 and group 2 applications that have been reviewed and are recommended for payment
- The total amount of grant funding available
- A recommendation on the number of group 1 and group 2 applications for payment based on available funding and other factors as determined by Pinellas County/City

Pinellas County/City will review the report, conduct sampling review of documentation, provide feedback, and provide the final approval for funding.

#### 1.4 Internal Controls

Accepting self-attestations: The intent of the ERA program is to provide assistance in high-need populations. In some cases, applicants may be eligible but do not have the documentation to support their eligibility. Pinellas County/City specifies in Section 1.2 the process by which the Pinellas County/City will allow written self-attestation of eligibility without further documentation.

To prevent fraud, case files are evaluated using the following review process:

- **Initial Review:** An Eligibility Specialist will evaluate the tenant and landlord application information and documentation using a reviewer checklist. The reviewer checklist addresses the information and documentation requirements described in Section 1.2: Eligibility. The reviewer checklist is housed in the Neighborly Software system. The Eligibility Specialist will complete the reviewer checklist stating that sufficient documentation has been provided to approve the case. The case file will include the following information:
  - The tenant application information and uploaded documentation
  - The landlord application information and uploaded documentation
  - Case file notes provided by the Eligibility Specialist, if applicable
  - Records of correspondence between the Eligibility Specialist and the applicant, if applicable
  - The reviewer checklist of the information and documentation provided for eligibility
  - First name and last name of the Eligibility Specialist
  - Date and time the application review was completed
- **Budget Review:** A Budgeting Specialist will calculate and complete rent and utilities budget for the application, this is a function in the Neighborly Software system.
- **Quality Assurance/Quality Control (QA/QC) Review:** A Lead Eligibility Specialist conducts an independent review of the case file and completes a checklist to confirm the case file is ready for payment recommendation review. Any issues with the case file will be addressed with the

Eligibility Specialist. Once the issues are resolved, the Lead Eligibility Specialist will change the status of the case to Pending Compliance Review in the application software system.

- **Payment Recommendation Compliance Review:** The Project Coordinator will generate a report of all cases that are Pending Compliance Review. This will be a batch file of pertinent data to assign and track compliance reviews and will not contain personally identifiable information (PII) of the applicant. The Operations Manager will conduct sampling review of documentation and evaluate the data for trends, anomalies, and issues. If additional information or follow-up is needed prior to the case being approved for payment, the Operations Manager will change the status to Returned for Review. The Project Manager or their designee is responsible for monitoring cases in the Returned for Review queue and following up to resolve. Once any issues have been resolved, the file is prepared in a payment recommendation report for payment approval review.
- **Payment Approval Review:** The Operations Manager will evaluate the payment recommendation report for trends, anomalies, and issues. Any issues will be addressed with the Project Manager. Once issues have been resolved, the cases are batch approved for payment and funds are disbursed.

## 1.5 Appeals Process

During the activities of the ERA Program, many decisions will be made involving each application. These decisions will be made based on implementation of the following:

1. Applicable federal regulations identified in Section 1 Policy
2. This Pinellas County/City of St. Petersburg COVID-19 Emergency Rental Assistance Policy and Procedure Manual

During these program activities and decisions, it is possible that applicants may believe they have a legitimate reason to appeal a decision made regarding their application. To allow for such circumstances, Pinellas County/City will allow applicants to submit their appeals for consideration. Pinellas County/City will attempt to resolve such issues in a manner that is both sensitive to the applicant's needs and achieves a result fully compatible with all applicable laws, regulations, and local codes and ordinances. The goal of Pinellas County/City is to provide an opportunity for applicants to receive a response to and/or resolve their issues in a timely manner, within fifteen (15) business days, if feasible.

Applicants residing outside the City of St. Petersburg may submit a written appeal by e-mail at [ERAPappeals@pinellascounty.org](mailto:ERAPappeals@pinellascounty.org) or by postal mail to:

Pinellas County Office of Management of Budget - ERAP Appeal  
14 South Fort Harrison Avenue  
Clearwater, FL 33756

Applicants residing in the City of St. Petersburg may submit a written appeal by email at [ERAPappeals@stpete.org](mailto:ERAPappeals@stpete.org) or by postal mail to:

City of St. Petersburg – ERAP Appeal  
One 4<sup>th</sup> Street North  
St. Peterburg, FL 33701

The process to address appeals is detailed in Section 2.2 Appeals Procedure.

## 1.6 Preventing Waste, Fraud, and Abuse

Pinellas County/City must have controls in place to ensure compliance with the policies and procedures outlined in this document to prevent fraud.

The application software will conduct an automatic check for duplicate application social security numbers. If duplicate social security numbers are identified, the Eligibility Specialist will contact the

applicant to determine whether the duplicate application was a user error. Duplicate applications will be moved to a Void status.

This program relies on the applicant to provide accurate and complete information. In each step of the application, the applicant must attest the information and documentation provided is accurate and complete. Pinellas County/City's approach to fraud prevention includes the following components:

1. Prevention
2. Deterrence
3. Anti-fraud controls
4. Fraud detection analytics

### 1.6.1 Fraud Prevention

The first component in mitigating fraud is to prevent it from happening. Prevention methods include:

- Applicants are provided with clear, routine, and consistent public messaging about the intent of the program and the eligibility requirements.
- If applicants do not complete the required fields and upload the required documentation, the reviewer will not approve the application until the correct information and documentation is provided.

### 1.6.2 Fraud Deterrence

Deterring fraud is another important component of reducing fraud. The application includes the following self-attestation that must be marked and electronically signed to deter applicants from intentionally providing false information.

The applicant(s) certifies that all information in this application, and all information furnished in support of this application, is given for the purpose of obtaining funding from Pinellas County/City of St. Petersburg under the Consolidated Appropriations Act (CAA), 2021, Pub. L. No. 116-260.

I understand that Title 18, Section 1001 of the U.S. Code states that a person is guilty of a felony for knowingly and willingly making a false or fraudulent statement to any department of the United States Government, which includes the U.S. Department of the Treasury.

I certify that the application information provided is true and complete to the best of my/our knowledge.

I agree to provide any documentation needed to assist in determining eligibility and am aware that all information and documents provided, except as exempted pursuant to law, are a matter of public record.

I further grant permission and authorize any bank, employer, or other public or private agency to disclose information deemed necessary to complete this application.

I authorize the ERA program staff to contact my landlord/property manager, employer, agencies, utility providers, and other applicable individuals for information about my family or myself for the purpose of rental assistance, case management, and referrals. This authorization includes any exempt or confidential information and all agencies and individuals with whom I have worked or may work through referral by any agency. This authorization will be considered a release. The release of content includes but is not limited to all information, including any exempt or confidential information, regarding rental history, rental amount, landlord information, income, employment, or other information needed to determine eligibility and process request for rental or utility assistance.

### **Notice of Collecting Social Security Numbers:**

Florida Public Records Law (specifically Section 119.071(5), Florida Statutes 2007), requires a written statement explaining the purpose and authority for collecting Social Security Numbers. Your Social Security Number is being collected for the purposes of income certification for the **Pinellas County/City of St. Petersburg Emergency Rental Assistance Program** which requires third-party verification of income. In addition, this information may be collected to verify unemployment benefits, social security/disability benefits, and other related information necessary to determine income and eligibility for the program that is funded by federal program dollars. Your Social Security Number will NOT be used for any other purpose other than verifying eligibility for the Program.

I agree that Pinellas County/City or its third-party designee may collect and retain any and all information, including credit history, which may be required in processing this application.

#### 1.6.3 Anti-Fraud Controls

The program includes the following measures to identify fraud and mitigate potential duplication of benefits:

- The application includes a form for the applicant to self-report any prior rental or utilities assistance during the pandemic period.
- The application requires the applicant to attest that the information is accurate and complete.
- The application includes a warning to applicants about the consequences for knowingly providing fraudulent or intentionally incorrect, illegible, or incomplete information.
- The application software will identify applications with the same social security number so that duplicates can be removed from the system.
- Eligibility Specialists are provided an initial 8 hours of program-specific training on identifying eligible applicants and detecting fraud.
- Lead Eligibility Specialists provide their staff with daily briefings regarding eligibility and fraud.
- The Project Manager provides daily briefings with Lead Eligibility Specialists on program updates and fraud prevention requirements.
- The Eligibility Specialist will evaluate applicant data to cross-reference the eligibility information and documentation to find inconsistencies and missing information.
- Applications are processed through a secondary QA/QC review independent of the application review process to detect issues and fraud.
- Instances of potential fraud will be reported to the U.S. Treasury at the following link: <https://www.treasury.gov/services/report-fwa/Pages/Treasury-Fraud.aspx>.

#### 1.6.4 Fraud Detection Analytics

The application software includes features to run reports on the application data. Pinellas County/City will conduct the following tasks to detect fraud through data analytics:

- Pinellas County/City will run reports of the application data to identify trends and anomalies for fraud detection and prevention.
- Pinellas County/City will conduct a QA/QC audit to identify potential duplication of benefits.
- To the extent the information is available Pinellas County/City will obtain data from prior rental assistance programs during the pandemic period so the applicants and amounts can be cross-referenced with this program.

If the Eligibility Specialist detects fraud in any application, the Eligibility Specialist will notify the Lead Eligibility Specialist for further review. The Lead Eligibility Specialist will review the documentation to determine if there is evidence of fraud and provide that information to their Supervisor, and then the Project Manager. If the application is determined to have evidence of fraud, the case will be referred to the Operations Manager.

## 1.7 Privacy Requirements

The Act requires that Pinellas County/City must establish data privacy and security requirements for certain information regarding applicants that:

- (i) include appropriate measures to ensure that the privacy of the individuals and households is protected;
- (ii) provide that the information, including any PII, is collected and used only for the purposes of administering rental assistance and submitting reports to Treasury; and
- (iii) provide confidentiality protections for data collected about any individuals who are survivors of intimate partner violence, sexual assault, or stalking.

The application data contains PII and must be kept secure per federal requirements and in accordance with the Grantee policies regarding Personally Identifiable Information.

Pinellas County/City ERA program personnel, including contractors, subcontractors, and partnering agency personnel, will not disclose applicant data outside of the program processes and procedures.

All applicant information and documentation will be obtained, managed, and maintained through the program software system, which is stored in U.S. FedRAMP-certified Microsoft data centers to maintain the security of the applicants' data.

Reports exported from the ERA program software system will contain aggregate data, and all PII information will be removed for the payment recommendation and payment approval process.

## 1.8 Maintaining Records

Pinellas County/City must maintain records and financial documents sufficient to support compliance with Section 501(c) regarding the eligible uses of Emergency Rental Assistance funds.

Each case file will include following the information and documentation:

- Application information described in Section 1.2 Eligibility
- Correspondence or other communication with applicants related to their application file
  - Date and time and method of correspondence or other communication (i.e. email, text, letter, phone).
  - First name and last name of staff corresponding with the applicant
- Case file notes from Eligibility Specialist
  - Date and time of notes
  - First name and last name of Eligibility Specialist
- Correspondence or other communication with local, state, federal, and partnering agencies regarding the applicant's application file
- Record of outreach to landlords and utility providers
  - Date and time of outreach
  - First name and last name of Eligibility Specialist
  - Record of frequency of outreach

- Determination of nonresponsive service provider
- For applications that are missing information or documentation, correspondence, or other communication to the applicant for additional information with the following:
  - Data and time and method of correspondence or other communication
  - First name and last name of Eligibility Specialist
  - Missing, incomplete, or illegible information or documentation that needs to be provided
  - Record of frequency of outreach
  - Determination of nonresponsive service provider
  - Determination of approval or denial
- For denied applications, correspondence, or other communication to the applicant with the following:
  - Date and time and method of correspondence or other communication
  - First name and last name of Eligibility Specialist
  - Justification for the denial determination
- For approved applications, a completed reviewer checklist stating that sufficient documentation has been provided to approve the application
  - Completed reviewer checklist with the first name and last name of the Eligibility Specialist and the date and time the initial review was completed
  - Completed QA/QC checklist with the first name and last name of the Lead Eligibility Specialist and the date and time the QA/QC review was completed
  - First and last name of the Project Manager and the date and time of the payment recommendation approval
  - First and last name of the Operations Manager or their designee and the date and time of the payment approval
  - Confirmation from the Operations Manager or their designee that funds have been disbursed

Pinellas County/City will also maintain the following program records:

- Pinellas County/City of St. Petersburg COVID-19 Emergency Rental Assistance Policies and Procedures Manual, which includes:
  - Policies and procedures for determining a household's eligibility for the ERA program
  - Policies and procedures for determining the prioritization of households in compliance with the statute
  - Policies and procedures for maintaining program records
  - Policies and procedures under what circumstances to accept applications without documentation
  - Policies and procedures to prevent fraud
  - Validation or fraud prevention procedures to prevent abuse
  - Controls to maintain compliance with the policies and procedures
- Weekly program status reports
- Monthly and quarterly reports for U.S. Treasury

- Record of key decisions made regarding the implementation of the Pinellas County/City ERA program

The Treasury Office of Inspector General and the Government Accountability Office, or their authorized representatives, shall have the right of access to records (electronic and otherwise) in order to conduct audits or other investigations. Records shall be maintained by Pinellas County and the City of St. Petersburg for a period of five (5) years after all funds have been expended or returned to the Treasury. Reports are due to the Treasury no later than 30 days after the end of the quarter.

| Quarter/Month | Dates   | Report Due Date  |
|---------------|---|------------------|
| Q1 2021       | January 1 – March 31 (90 days or 91 days in leap years) | May 12, 2021     |
| April         | April 1 – April 30 (30 days)                            | May 18, 2021     |
| May           | May 1 – May 31 (31 Days)                                | June 15, 2021    |
| Q2 2021       | April 1 to June 30 (91 Days)                            | July 30, 2021    |
| Q3 2021       | July 1 – September 30 (92 days)                         | October 30, 2021 |
| Q4 2021       | October 1 – December 31 (92 days)                       | January 30, 2022 |

## 2 Procedures

This section of the manual describes how Pinellas County/City will administer the ERA program in accordance with the policies described in Section 1 Policies.

While the organizational structures and payment processing functions vary, the Operations Manager for each jurisdiction is ultimately responsible for the program execution.

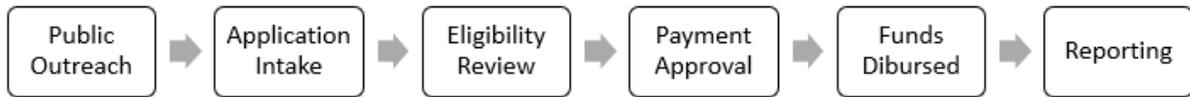
- The Project Coordinator provides overall program support and coordination.
- The Project Manager provides overall direction and control for program staff.
- The Quality Control Reviewer (QCR) provides a QA/QC review of work performed by the Eligibility and Budgeting Specialists and then creates the draw.
- The Budgeting Specialist will calculate the applicant’s budget.
- The Eligibility Specialists review and process ERA applications.
- The Customer Service Representatives answer questions from the public about the Pinellas County ERA Program.
- The Compliance Specialists review ERA applications post-processing to verify compliance with Program Policies & Procedures.
- Finance Accounts Payable provides final audit and processes payments.

The following process flow shows the major elements of the program. There are additional processes within each one of these program elements.

- Public outreach to advertise the program to the community
- Application intake to receive and process applications through the Neighborly Software system.

- Application review which includes 4 review stages: initial review, QA/QC review, payment recommendation compliance review, and payment approval review
- Payment approval where eligible applicants are approved for payment
- Funds disbursed to eligible applicants
- Reporting to the U.S. Treasury per program policies

#### Overarching Program Process Flow



### 2.1 Eligibility Review SOP

The following diagram provides a graphical representation of the Eligibility Review process and the four stages of eligibility review.

- **Initial Review:** An Eligibility Specialist will evaluate the tenant and landlord application information and documentation using a reviewer checklist that is built into the application software.
- **Budgeting Review:** A Budgeting Specialist will create a budget.
- **QA/QC Review:** The Quality Control Reviewer (QCR) provides a quality assurance/quality control review of work performed by the Eligibility and Budgeting Specialists, then creates the draw and completes the QA/QC checklist to confirm the Initial Review is accurate and the case file is ready for payment recommendation review.
- **Payment Recommendation Compliance Review:** The Project Coordinator will generate a report of all cases that are Pending Compliance Review to conduct the payment recommendation compliance review.
- **Payment Approval Review:** The Operations Manager will evaluate the payment recommendation report and submit final payment approval.

### 2.2 Initial Review

During the Initial Review, an Eligibility Specialist will evaluate the tenant and landlord application information and documentation using a reviewer checklist. The reviewer checklist addresses the information and documentation requirements described in Section 1.2 Eligibility. The Reviewer checklist is housed in the Neighborly Software system.

The Eligibility Specialist will complete the reviewer checklist stating that sufficient documentation has been provided to approve the case. The case file will include the following information:

- The tenant application information and uploaded documentation
- The landlord application information and uploaded documentation
- Case file notes provided by the Eligibility Specialist, if applicable
- Records of correspondence between the Eligibility Specialist and the applicant, if applicable
- The reviewer checklist of the information and documentation provided for eligibility
- First name and last name of the Eligibility Specialist
- Date and time the application review was completed

When the tenant and landlord applications are approved and the case is ready to move forward, the Eligibility Specialist enters *Original Amount* and *Other Disbursements* in the budget for the case and changes the status to Application Quality Assurance Review. In instances where the landlord does not wish to participate, this will be noted in the audit log and the landlord application may be changed to a complete status and the case continue through the review process. In these cases, Pinellas County/City may consider making payments directly to the household, depending on the specific circumstances of the case. Such determinations are made by staff assigned to review appeals and documented in the case audit log.

### 2.2.1 Budgeting Review

**Budgeting Review:** The Budgeting Specialist reviews the application to develop the budget.

### 2.2.2 QA/QC Review

**Quality Assurance/Quality Control (QA/QC) Review:** A QCR will conduct an independent review of the case file and complete the QA/QC checklist to confirm the case file is ready for payment recommendation review. Issues with the case file should be discussed with the Eligibility Specialist who reviewed the file and addressed.

The QA/QC Review Checklist provides the list of acceptable information and documentation from Section 1.2 Eligibility that the Lead Eligibility Specialist should confirm is present in the applicant case file, or a self-attestation has been provided in lieu of missing documentation where applicable.

As an additional review before entering the amount requested in the budget, the Lead Eligibility Specialist will conduct the following verifications:

- **Address Check** - The Lead Eligibility Specialists will generate a report of address data for applications that are ready for Payment Recommendation Review to confirm the address are within the jurisdiction. Outliers will be addressed individually.
- **Property Owner Check** – The Lead Eligibility Specialist will generate a report of owner data for applications that are ready for Payment Recommendation Review. The owner data will be inputted into property tax software to confirm the name matches the owner in the database. Outliers will be addressed individually.

After verifying this information, the Lead Eligibility Specialist enters the *Amount Requested* in the draw request and changes the case status to Pending Compliance Review.

### 2.2.3 Compliance Review

At the close of each business day, the Project Coordinator will generate a report of all cases that are pending compliance review, validate that the total reflected in the report matches the application portal system, and save the report to a designated secure file location. This will be a batch file of pertinent data to conduct sampling and assign cases for compliance review and will not contain personally identifiable information (PII) of the applicant.

Based on this report, the Operations Manager assigns cases Pending Compliance Review to Compliance Specialists for review. During the Compliance Review, a Compliance Specialist will evaluate the tenant and landlord application information and documentation using a compliance review checklist. The compliance reviewer checklist addresses the information and documentation requirements described in Section 1.2 Eligibility and is housed in the Neighborly Software system.

During the initial weeks of the program, 100% of applications recommended for approval will be reviewed for compliance with program policies and procedures. After establishing the baseline error rate – the percent of applications recommended for payment approval which are not ready payment approval – the Operations Manager will integrate use of a sampling calculator to select a sample of applications

recommended for approval to assign for compliance review. The sampling rate is based on the number of applications recommended for approval on a given day, per the following sampling plan:

| Number of Applications Recommended for Approval per Day | Sample Size |
|---|-------------|
| 250 or fewer  | 10%         |
| More than 250   | At least 60 |

Following integration of the sampling calculator, the Project Coordinator will enter the draw amount in the *Amount Approved* for any applications not assigned for compliance review and change the status to Payment Pending Audit at this step.

The Compliance Specialist reviews and verifies the entire case file, including the duplication of benefits check, to confirm compliance with program policies and procedures. The Compliance Specialist completes the compliance review checklist verifying that sufficient documentation has been provided to approve the case. Following completion of review, if the case is complete and ready to move forward, the Compliance Specialist enters the draw amount in the *Amount Approved*, changes the status of assigned applications to Compliance Review and documents any findings and recommendations in the audit log. If any issues are identified, the Compliance Specialist notes them in the audit log.

If additional information or follow-up is needed prior to the case being approved for payment, the Operations Manager will change the status to Returned for Review. The Project Manager or their designee is responsible for monitoring cases in the Returned for Review queue and following up to resolve.

If cases are complete and ready to move forward, the Operations Manager will batch approved draws and change the status to Payment Pending Audit

#### 2.2.4 Payment Recommendation Report

At the start of each business day, the Operations Manager will generate a report of all cases that are Payment Pending Audit with an accomplishment date of the prior day, validate that the total reflected in the report matches the application portal system, and save the report to a designated secure file location.

The payment recommendation report will include the following information:

- The total number of cases in each stage of the process.
- Total number of cases eligible for reimbursement.
- Total number of priority cases eligible for payment.
- Total number of priority group 2 cases eligible for payment.
- A payment recommendation based on the status of the applications, number of priority and priority 2 cases, and available funding to determine how many priority and priority 2 cases will be approved for funding.

The payment recommendation report will also include the batch file of cases with status Payment Pending Audit. The file will include the following for each case:

- Case number
- Verified size of household
- Verified household income
- Level of income based on HUD AMI Percentages
- Whether the household has one or more members who is unemployed and has been unemployed for the prior 90 days

- Financial hardship due directly or indirectly to COVID
- Amount of rental assistance
- Amount of utilities in arrears or other housing expenses
- Duplication of Benefits findings
- Combined number of months of assistance provided
- Accomplishment Date

### 2.2.5 Payment Approval Review

The Operations Manager will evaluate the payment recommendation report for trends, anomalies, and issues and identify any cases that need further review before funds are disbursed.

The Project Manager will address any cases that need further review. For cases that are approved, the Operations Manager will prepare and securely submit the recommendation of payment to Finance Accounts Payable for processing. The recommendation will include the Payment Recommendation Report and PDF cover sheet signed by the Operations Manager with case numbers, dollar amounts, approval statement.

## 2.3 Funds Disbursement

**Vendor Set-up for County:** At least weekly Finance Accounts Payable (County) will generate a report from the application software of landlord applications in Landlord Application Complete status to complete vendor set up in accounting system and update the Vendor ID in the application software.

Daily, the Operations Manager will generate a Payment report from the application software with the data needed to disburse checks for cases that are Payment Pending Audit. The Project Coordinator will prepare a payment approval cover page for the Operations Manager's signature.

For County applications, the County Operations Manager will submit the signed cover page and Payment report to Finance Accounts Payable. Finance Accounts Payable will complete pre-audit, disburse the checks, and provide the Project Manager with the list of case files that were paid, and the amount disbursed. The Project Manager will mark these case files as disbursed and change the status of those case files to Paid. Once complete, the Project Coordinator will validate that all case files have been updated appropriately.

For City applications, the City Operations Manager will submit the signed cover page and Payment report to the Administrative Manager who will perform an additional audit check, after which the Accountant II will forward to Finance Accounts Payable. Finance Accounts Payable will complete pre-audit, disburse the checks, and provide the Accountant II with the list of case files that were paid, and the amount disbursed. The Accountant II will change the status of those case files to paid. Once complete, the Administrative Manager will validate that all case files have been updated appropriately.

The following list provides definitions for each stage of the case file in the tenant application portal. Most statuses will also have a "PC" or "SP" designation indicating whether the case is a Pinellas County or City of St. Petersburg applicant, respectively.

- Application in Progress – The applicant is in the process of completing the application and has not submitted it yet.
- Application Submitted – The applicant has completed the application.
- Application Under Review – An Eligibility Specialist has started reviewing the application files for eligibility. The application will then undergo multiple checks for completeness. Applicants with incomplete information will receive a request to provide the missing information.

- Pending Applicant Information – The application has missing, illegible, or incorrect information. The applicant has been notified to provide the additional information but has not yet responded.
- Pending Landlord Information– The tenant application has been reviewed, and the reviewer is waiting for the landlord to submit information.
- Applicant Non-Responsive – The applicant has been contacted three times either by phone and/or email within 21 days and the applicant has not responded.
- Payment Pending Audit – The initial review, quality assurance/quality control review, and client review are complete, and the case is ready for final audit prior to payment.
- Paid – The case has been paid.
- Withdrawn – The application has been withdrawn by the applicant.
- Denials Under Review – Application recommended for denial pending review.
- Denied – The application has been denied by the review team. The applicant will receive an email with the reason(s) for denial.
- Void Duplicate Application – The application was duplicated, and the duplicate application has been voided.
- Recertification Submitted – The applicant has submitted a recertification for additional assistance after initial assistance has been received.

Additional statuses for the Administrator portal in Neighborly:

- PC Budgeting – Eligibility Specialist calculates and completes the budget for the application.
- PC QA Review – The initial review of the application is complete, and the case is ready for quality assurance/quality control review.
- PC Under Review – An Eligibility Specialist has started reviewing the case files for eligibility.
- PC Compliance Review – A Compliance Specialist is reviewing the case files for compliance with policies and procedures.
- PC Pending Compliance Review – The initial review and quality assurance/quality control review are complete, and the case is ready for compliance review.
- PC Priority 2 – The applicant may be eligible but does not meet the Priority 1 requirements.
- PC Returned for Review – The case has been returned for additional review. Something in the case file appears incorrect.

## 2.4 Appeals Procedure

Pinellas County and the City of St. Petersburg will assign staff for the ERA Program to oversee the appeals process.

### Applicant Concerns, Requests, Suggestions, and Appeals Policy

During the activities of the ERA Program, many decisions will be made involving each application. These decisions will be made based on the County or City's interpretation of:

1. Applicable federal and state statutes,
2. The Code of Federal Regulations,
3. State and local codes and ordinances,
4. Local guidelines,
5. The Pinellas County/City of St. Petersburg COVID-19 Emergency Rental Assistance Policies & Procedures Manual

During these Program activities and decisions, it is possible that applicants may wish to present a concern, suggestion or request related to the Program and/or one or more of its decisions. In addition, once they receive a response to their issue, they may believe they have a legitimate reason to appeal that response. To allow for such circumstances, Pinellas County/City will allow applicants to submit their issues for consideration to the staff assigned to the appeal. The aim of Pinellas County/City will be to always attempt to resolve such issues in a manner that is both sensitive to the applicant's needs and achieves a result fully compatible with all applicable laws, regulations, and local codes and ordinances. The goal of Pinellas County and the City of St. Petersburg is to provide:

1. An opportunity for applicants to receive a response to and/or resolve their issues in a timely manner, within fifteen (15) business days, if feasible, and
2. The ability for applicants who participate in this process to appeal adverse program decisions, which involve an eligibility and/or priority determination.
3. The assigned staff and/or designee will maintain case files on all applicant concerns, suggestions, and requests to include the date input was received/case opened, applicant name, input summary, follow up activities, a reference to the Decision Memorandum for the case and the date the case was closed.

Applicants may submit a written concern, suggestion, or request by email. Appeals for applicants residing outside of the City of St. Petersburg may be emailed to [ERAPappeals@pinellascounty.org](mailto:ERAPappeals@pinellascounty.org). Appeals for applicants residing within the City of St. Petersburg may e-mailed to [ERAPappeals@stpete.org](mailto:ERAPappeals@stpete.org). The process for appealing a response will be provided in a written response to each applicant who submits a concern, suggestion, or request.

## Policy Scope

This policy is applicable to all ongoing activities of Pinellas County/City of St. Petersburg ERA Program as detailed in this Policy and Procedure Manual.

## Appeals Procedures

The procedures for this policy are as follows:

1. Notice of the process to convey a concern, suggestion, or request; the ability to appeal a decision response will be made available to all applicants of the ERA Program and posted on the website.
2. The staff assigned to appeals will consist of the following:
  - a. Pinellas County Appeals:
    - a. Housing and Community Development Director
    - b. ERA Project Coordinator
  - b. City of St. Petersburg Appeals:
    - a. Housing and Community Development Director
    - b. Housing Finance Coordinator
3. Applicants shall convey their concerns, suggestions, and requests using a written or electronic document, which is emailed or postal mailed to the ERA Program.
4. Complaints/Concerns/Suggestions/Requests may be submitted to:
  - a. [ERAPappeals@pinellascounty.org](mailto:ERAPappeals@pinellascounty.org) - for applicants residing outside of the City of St. Petersburg; or
  - b. [ERAPappeals@stpete.org](mailto:ERAPappeals@stpete.org) – for applicants residing within the City of St. Petersburg

The assigned staff will review all concerns, suggestions, requests, and appeals and will attempt to resolve each applicant's issue and/or provide them with a decision response in a timely manner, within fifteen (15) business days, if feasible;

5. When considering applicant's concerns, suggestions, and requests, assigned staff will utilize the following process:
  - a. Review information provided by each applicant so that they fully understand all aspects of the applicant's issue and viewpoints;
  - b. Review all policies, if any, relevant to the applicant's issue and viewpoints,
  - c. Weigh each applicant's issue, viewpoints, policy implications, and Legal Counsel's analysis, if any, and make a recommended decision;
  - d. Document each recommended decision and rationale in a Decision Memorandum. Once the recommended decision has been approved, the assigned staff person or designee will communicate via mail or e-mail the decision in a response to each applicant, and fully explain the appeal process.
6. The appeal decision as outlined in the Decision Memorandum will be considered final.