

Pinellas County/City of St. Petersburg

COVID-19 Emergency Rental Assistance Policies and Procedures Manual

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Updated: 6/24/2022

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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 and through the American Rescue Plan Act (ARPA) of 2021, Pub. L. No. 117-2. 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:

- Section 501(a) of Division N of the Consolidated Appropriations Act (CAA), 2021, Pub. L. No. 116-260 (Dec. 27, 2020)
- Section 3201 of the American Rescue Plan Act of 2021, Pub. L. No. 117-2 (March 11, 2021)
- 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 August 25, 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.

As these Policies and Procedures are updated to reflect additional guidance, applications that have previously been denied or moved to a non-responsive status will be re-reviewed based on updated Program Policies and Procedures. Applicants will be notified of the change in the status of their application and asked if they are still requesting assistance. The audit log will capture the change in application status and the request and response from the applicant.

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 is administered by the U.S. Treasury and provides directly to Pinellas County \$21,421,218.80 through the CAA and \$24,935,835 through ARPA. Funding provided through CAA will be referred to as ERA1 and funding provided through ARPA will be referred to as ERA2. 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 through CAA and \$6,339,881 through ARPA. 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. (UPDATE: On March 8, 2022 the Board of County Commissioners expanded the County program boundaries to include eligible households in the City of St. Petersburg in response to the expenditure of all City ERA1 and ERA2 funds).

For ERA1, an eligible household may receive up to twelve (12) months assistance (plus an additional three (3) months if necessary to ensure housing stability for the household, subject to availability of funds). The aggregate amount of financial assistance an eligible household may receive under ERA2, when combined with financial assistance under ERA1, must not exceed 18 months.

Assistance 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. Applicants who qualify for ERA1 will have funds disbursed under ERA1 up to 15 months of assistance, subject to availability of funds; remaining months of assistance will be disbursed through ERA2. Applicants who qualify for ERA1 will automatically qualify for ERA2 funds. If a tenant qualifies for ERA2 but not ERA1, funds will be disbursed under ERA2. In no case may an eligible household receive more than 18 months of assistance under ERA1 and ERA2 combined.

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. Effective 6/27/2022, utilities and other fees, such as late fees, charged by the landlord will be the responsibility of the tenant. The ERA Program will only cover base rent. Utilities established in the name of a household member, through a service provider such as Duke, TECO, or a local water company, will still be eligible for assistance.

The ERA program can include assistance for other expenses related to housing including relocation expenses, such as rental security deposits, and rental fees, which may include application or screening fees. Effective 4/11/2022, ERA program assistance is available for the cost of a hotel or motel room occupied by an eligible household as described in section 1.2.10. For ERA1, such housing-related expenses must be incurred due, directly or indirectly, to the COVID-19 pandemic. The ERA program does not cover legal fees including those incurred from eviction proceedings. All payments for housing-related expenses must be supported by documentary evidence such as a bill, invoice, or evidence of payment to the provider of the service.

In situations where a qualifying rental household is displaced, has been evicted or is currently experiencing homelessness, the household 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), the cost of hotel or motel room, rental security deposits, utility deposits, and rental fees, which may include application or screening fees. 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. The Certification of Eligibility will obligate three months' rent based on Fair Market Rent for the area for a period of 90 days from date of issuance. Effective 5/19/22, due to limited

funding, Certifications of Eligibility are no longer being issued. Upon entering a new qualifying rental agreement with a term of at least 6 months, 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 situations will be captured in the audit log. To recertify for any additional months of ERA Program benefits (up to the cumulative maximum 18 months assistance), the tenant must be living in a unit and provide a copy of a current rental agreement.

For ERA1 at least 90% of the funds received by County/City will be used for the following needs:

- i. Rental payments
- ii. Rental arrears payments
- iii. Utilities and home energy payments
- iv. Utilities and home energy arrears payments
- v. Other expenses related to housing incurred due directly or indirectly to the COVID-19 pandemic

For ERA2, at least 65% of the funds received by Pinellas County and at least 85% of the funds received by the City of St. Petersburg will be used for the following needs:

- i. Rental payments
- ii. Rental arrears payments
- iii. Utilities and home energy payments
- iv. Utilities and home energy arrears payments
- v. Other expenses related to housing

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 three attempts by phone or e-mail over a 5 calendar-day period to request the service provider's participation or if the service provider confirms in writing that they do not wish to participate, Pinellas County/City will make payments directly to the qualifying household. All outreach attempts to the landlord and any payment of assistance directly to the tenant will be documented in application portal 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 a renter household residing in Pinellas County and Pinellas County/City must determine that:

- 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 during or due, directly or indirectly, to the COVID-19 pandemic;
- one or more individuals within the household can demonstrate a risk of or experiencing homelessness or housing instability; and
- the household has a household income at or below 80% of area median income.
- 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. (UPDATE: On March 8, 2022 the Board of County Commissioners expanded the County program boundaries to include eligible households in the City of St. Petersburg in response to the expenditure of all City ERA1 and ERA2 funds).

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 COVID-19 Economic Hardship

To be eligible for assistance through the program, one or more members of the applicant's household must have either:

- qualified for unemployment benefits; or
- for ERA1, experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the COVID-19 outbreak; or
- for ERA2, experienced a reduction in household income, incurred significant costs, or experienced other financial hardship during or due, directly or indirectly, to the coronavirus pandemic.

ERA applicants may upload any readily available supporting documentation regarding household members' qualification for unemployment benefits, experience of other financial hardship, or risk of homeless or housing instability at the time of application. Supporting documentation must be dated on or after March 13th, 2020.

Applicants may also self-attest directly in application that due directly or indirectly to the COVID-19 outbreak they or another household member qualified for unemployment benefits, experienced a reduction in household income, incurred significant costs, or experienced a financial hardship. This is the standard for ERA1.

Applicants are also asked to self-certify any applicable financial hardships experienced by one or more members of the applicant's household during the COVID-19 pandemic (since March 13, 2020) as eligible under ERA2. Applicants certifying "Other" financial hardship in this section are required to provide additional information or documentation in the application explaining their situation.

Because the standard in ERA2 is broader than the standard in ERA1, any applicant that self-certifies that it meets the standard in ERA1 will be considered to meet the standard for purposes of ERA2.

1.2.2 Risk of Homelessness

Pinellas County/City requires that one or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability. The applicant will provide documentation or self-certify that one or more members of the applicant's household are currently at risk of or experiencing homelessness or housing instability, conditions may include:

- Received a past-due rent notice or eviction notice
- Received a past-due or cut-off notice from a utility provider
- Risk of eviction or lease termination
- Living in a residence that is not permanent or "living doubled up" (staying with friends or relatives)
- Struggling to pay rent and utilities, or rent and utilities are more than your household can afford
- Relying on credit cards or depleting savings to pay for rent or utilities
- Struggling to pay for essentials such as food, prescription drugs, childcare, or transportation
- Experiencing unsafe, unhealthy, or unstable living conditions

Applicants certifying "Other" housing instability conditions in this section are required to provide additional information explaining their situation in the application.

Households where documentation of rental obligation and household income show that rent exceeds 30% of household income will be considered to meet the standard for this requirement, without requiring further documentation.

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 requires applicants to self-report and attest to the household income and provide documentation the income for all adult household members using ONE of the following methods:

- A copy of the household's most recent Form 1040 Tax Return for all adult household members as filed with the IRS, but not older than tax 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, or unemployment compensation showing income for each adult household member over the 60 days preceding the application (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);
- Determination letter from another government agency dated on or after January 1, 2020, that verifies the applicant’s household income or status as a low-income household;

If income documentation is not readily available, self-attested household income as provided and certified by the applicant will be accepted without further proof of income only in the following cases:

- Qualifying households with an eviction case filed in court. Household income will be reassessed every three months by obtaining appropriate documentation or a new self-attestation.
- Household members with no income who are self-reported as currently being unemployed

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 such a third-party 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.

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 Form 1040 income, but subsequently became income eligible during the pandemic.

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

Table 1 – Area Median Income Limits

Family Size	50% of Median Income	80% of Median Income
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>

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. Household members are any additional relatives or persons residing in the home, including but not limited to other family members, roommates not on a separate lease, visitors expected to stay an indefinite length of time, and college students expected to return to the home. The information collected in the application 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 adult household members 18 years old or older (Driver's License, Florida ID Card, birth certificate, social security card, or green card);
 - Government-issued identification that have expired since March 2020 are acceptable
- Electronic form completed by the applicant indicating the full name and date of birth of each household member;
- Electronic form completed by the applicant indicating name and contact information for any 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 or 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 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.

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 or a written attestation by a landlord who can be verified as the legitimate owner or management agent of the unit. Absent a signed rental agreement, qualifying applicants may receive assistance with arrears and 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 self-report their currently monthly rental obligation and provide ONE of the following to verify the rental payment amount:

- i. 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
- ii. Bank statements, check stubs, or other documentation that reasonably establishes a pattern of paying rent; or
- iii. An attestation by a landlord who can be identified as the verified owner or management agent of the unit.

If an applicant is able to provide satisfactory evidence of residence per 1.2.5, but is unable to present adequate documentation of the amount of the rental obligation as described above, Pinellas County/City will accept the self-reported information attested to in the tenant application to support the payment of assistance only in cases where (i) the household has an eviction filed in court or (ii) the applicant cannot provide a rental agreement or other documentation due to legitimate reasons (as determined and documented by Pinellas County/City). Such assistance may not exceed a monthly maximum of 100 percent of the greater of HUD's Fair Market Rent or Small Area Fair Market Rent for the area in which the applicant resides, as most recently determined by HUD and made available at <https://www.huduser.gov/portal/datasets/fmr.html>. This limited payment is intended to provide the most vulnerable households the opportunity to gather additional documentation of the amount of the rental obligation or to negotiate with landlords to avoid eviction. The assistance described in this paragraph may only be provided for three months at a time, and evidence of rent owed consistent with the above must be provided after three months to provide further assistance to such a household; the U.S. Treasury expects that in most cases the household would be able to provide documentation of the amount of the rental obligation in any applications for further assistance.

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 10th of the current month. Partial payments made by the tenant will be applied to the earliest rent arrears.

1.2.7 Landlord Participation

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 OR completed electronic W-9 Form in the landlord application;
- Monthly ledger and/or other financial records from the landlord indicating the tenant's contact information, rental arrears and non-variable fees included in rent, 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;
- 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 attempt to 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. All outreach attempts will be documented in the audit log.

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 the landlord's contact information, including e-mail address; and
- 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 18 months total of arrears and prospective payments).

1.2.8 Utilities Assistance Verification

As part of the program, Pinellas County/City will provide payments for utilities cost and arrears (missed payments). Utility payments will only be made at the time of rent payment processing including original payment and additional funds request (AFR). No advance payments or individual payments for utilities will be made without being associated with a rent payment. Utility bills with a statement date more than 30 days prior to when the payment recommendation is provided to Pinellas County/City will require review staff to follow-up with the utility provider to request an 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 utility payments requested (not to exceed 18 months total of payments).

1.2.9 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. 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 during the applicable timeframes of assistance:

Data Set	Coordinating Agency	Point of Contact	Timeframe for Requested Assistance
City of St. Petersburg Financial Assistance	City of St. Petersburg	Lynn Farr	Calendar Year 2020
City of Largo	City of Largo	Arrow Woodward	Calendar Year 2020
City of Clearwater	City of Clearwater	Kara Grande	Calendar Year 2020
State Housing CRF	Pinellas County	Sherilyn Harris	Calendar Year 2020
CARES Individual & Family Financial Assistance	Pinellas County and 211 Tampa Bay Cares	Joe Riddle	Calendar Year 2020
CHAP	Pinellas County & HEP	Rebecca Wayne	Calendar Year 2021 & 2022
State of Florida ERA Program (OUR Florida)	Tidal Basin	Alex Ali	Calendar Year 2021 & 2022
Boley Centers, Inc.	City of St. Petersburg	Lynn Farr	Calendar Year 2021 & 2022
Catholic Charities	City of St. Petersburg	Lynn Farr	Calendar Year 2021 & 2022

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 Members Verification;
- Self-attestation from the applicant with the amount of previous assistance received; and
- Self-attestation from the applicant that the information is accurate and complete.

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.

Pinellas County/City may provide assistance for applicants who previously received assistance from OUR Florida if the applicant has been denied by OUR FL or is no longer eligible to receive assistance from the program because they have met the maximum monthly payment of \$2,000, \$15,000 program amount or 15 months of assistance. Applicant will need to provide documentation of denial of additional assistance from OUR FL and an updated ledger/documentation from the landlord to verify what assistance was received from OUR Florida.

1.2.10 Hotel/ Motel Stays

The cost of a hotel or motel room occupied by an eligible household may be covered using ERA assistance within the category of certain “other expenses related to housing” (as described in Treasury [FAQ 7](#)) provided that:

- i. the household has been temporarily or permanently displaced from its primary residence or does not have a permanent residence elsewhere;
- ii. documentation of the hotel or motel stay and proof of payment by the applicant is provided; and
- iii. other applicable requirements provided in the statute and FAQs are met.

Eligible displaced tenants who have lived in the same hotel/motel for a minimum period of 30 continuous days or have been evicted from their permanent residence within the past 30 days, can be reimbursed for documented hotel/motel expenses paid by applicant. The displacement must have occurred on or after March 13, 2020. Applicants must have been a Pinellas County resident at the time of displacement. The applicant will be required to provide documentation such as a residential lease agreement, utility bill, or other documentation that establishes proof of Pinellas County residency. Hotel/motel expenses are limited to 120 days or a maximum amount of \$9,000.00, whichever is less. Applicants must provide invoices and proof of payment. Invoices must include dates of stay, household member name, charges, hotel/motel name, and proof of payment. Hotel/motel payments made on behalf of an applicant by anyone other than a household member(s) such as a non-profit organization or other government agency are not eligible for reimbursement. Unpaid hotel/motel expenses (arrears) will be paid directly to the hotel/motel. Payments will not be made for a period of time less than 30 days unless the applicant has secured permanent housing or it is a final benefit payment. The cost of the hotel/motel stay includes room only and does not include any expenses incidental to the charge for the room.

Hotel/motel expenses prior to January 1, 2022 are not eligible.

The applicant must currently reside in the hotel/motel to receive reimbursement, unless permanent housing has been secured. Applicants that no longer reside in the hotel/motel, regardless of reason and is residing in a car, with family, or other housing not considered permanent, will not be eligible. If an applicant relocates to a different hotel/motel, the applicant must meet the 30 day continuous stay at the new hotel/motel to qualify for reimbursement.

Assistance provided for the amount of time spent in a hotel/motel will count as time against the total number of months an applicant is allowed to receive ERA assistance (18 months). The cost of the hotel/motel will be recorded in the Neighborly software system as hotel/motel assistance to record the number of months of assistance.

Applicants who reside at a hotel/motel and have a valid lease agreement will be considered eligible through the rental portion of the application and not hotel/motel. These applications will be processed as rent assistance.

If an applicant is currently homeless, they should be referred to 211 Tampa Bay Cares for assistance through other available funding sources and agencies.

1.3 Prioritizing Households

Priority for funding will be given to renter households that qualify as very low income (less than 50% AMI), households in which one or more members is currently unemployed and has been unemployed for at least 90 days prior to the application, and households that have an eviction filed in court. 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
- 5 points for households that have an eviction filed in court
- 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, households with income at or below 50 percent of the area median income and households with an eviction filed in court
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.

Any short-term variations from this protocol as may be required during implementation of any changes in program policies and procedures will be documented in ERA program files.

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 to determine whether sufficient documentation has been provided to recommend approval of the case as eligible for emergency rental assistance. The case file will include the following information:

- The tenant application information and uploaded documentation
- The landlord application information and uploaded documentation, if applicable
- Case file notes provided by the Eligibility Specialist documenting any specific circumstance relevant to eligibility recommendation
- Records of any correspondence between the Eligibility Specialist and the applicant
- 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 and document the reason for return in the audit log. 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 has allowed applicants to submit their appeals for consideration within 30 days of denial notification. Effective 6/27/22, all denials will be considered final and cannot be appealed. Applications denied prior to 6/27/22 will have 30 days from denial notification to submit an appeal. 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 may submit a written appeal by e-mail at 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

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. When submitting an 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 agree that if benefits received following receipt of Emergency Rental Assistance funds are a duplication of benefits received from other sources such as federal benefits or charitable donations, that any subsequent assistance received shall be repaid by the Applicant to the County or City up to the amount of the Applicant's award under the Emergency Rental Assistance Program (this statement added after September 3, 2021)

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 the 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.
- A Duplication of Benefits check occurs upon initial review by Eligibility Specialists and again at Compliance Review before payment is issued.
- 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. 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>.

1.7 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 documenting any specific circumstances relevant to eligibility recommendation
 - 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

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.

Q1 2021	Award Date – March 30 (90 days or 91 days in leap years)	May 12, 2021
April	April 1 – April 30 (30 days)	May 17, 2021
May	May 1 – May 31 (31 Days)	June 15, 2021
June	June 1-June 30 (30 days)	July 15,2021
Q2 2021	April 1 to June 30 (91 Days)	July 29, 2021
July	July 1 – July 31 (31 days)	August 16, 2021
August	August 1 – August 31 (31 days)	September 15, 2021
Q3 2021	July 1 – September 30 (92 days)	October 15, 2021
Q4 2021	October 1 – December 31 (92 days)	January 17, 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.
- Eligibility review which includes four review stages: initial review, budgeting, QA/QC review, and payment recommendation compliance 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 whether 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, if applicable
- Case file notes provided by the Eligibility Specialist documenting any specific circumstance relevant to eligibility recommendation
- Records of any correspondence between the Eligibility Specialist and the applicant
- 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 has indicated in writing that they do not wish to participate, this will be noted with a copy of the correspondence 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 will make payments directly to the household, and document it 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 will 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 addresses 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

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.

All applications recommended for approval will be reviewed for compliance with program policies and procedures.

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
- Whether the household has an active eviction in court
- Financial hardship due, directly or indirectly, to the COVID-19 pandemic
- Financial hardship during the COVID-19 pandemic
- Risk of homeless or housing instability
- Amount of rental assistance
- Amount of utilities assistance
- Amount of 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 or designee(s) 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.

On a daily basis, 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.

City applications funded by the County will be submitted separately to Finance Accounts Payable for tracking.

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.
- PC/SP Recertification Submitted – The Eligibility Specialist has completed the initial review for the recertification case.
- Recertification Compliance – A Compliance Specialist is reviewing the recertification case for compliance with policies and procedures.

The following additional statuses are used to track applications under review within the Administrator portal in Neighborly:

- Budgeting – Eligibility Specialist calculates and completes the budget for the application.
- QA Review – The initial review of the application is complete, and the case is ready for quality assurance/quality control review.
- Under Review – An Eligibility Specialist has started reviewing the case files for eligibility.
- Compliance Review – A Compliance Specialist is reviewing the case files for compliance with policies and procedures.
- Pending Compliance Review – The initial review and quality assurance/quality control review are complete, and the case is ready for compliance review.
- Priority 2 – The applicant (i) may be eligible but does not meet the Priority 1 requirements, (ii) has been provided a Certification of Eligibility obligating rental assistance on behalf of the

household, or (iii) has extenuating or unusual circumstances that need to be researched and vetted prior to resolution.

- Returned for Review – The case has been returned for additional review. Something in the case file appears incorrect.

2.4 Recertifications

Recertification is a process that reactivates existing ERAP applications to allow for the payment of additional rent and utility assistance up to the 18-month maximum. ERAP applicants who previously received assistance through the COVID-19 Emergency Rental Assistance Program are eligible to recertify their eligibility so that they may receive additional assistance for rent arrears and up to an additional three months of future rent. The amount of ERAP assistance cannot exceed the eighteen-months of assistance. Rent in arrears receives first priority. Utilities will be paid under recertification. Applicants who have already received the full 18 months are not eligible for recertification. Effective 12:00 a.m. on 5/26/22, the ERA Program is closed to new applications and recertifications. Only applications and recertifications in a submitted status prior to this date will be processed.

2.4.1 Recertification Process

Pinellas County/City utilizes an online application portal for processing applications. Applicants are notified of their potential recertification eligibility 60 days from the date that their initial assistance was marked as Paid in the online portal. Each eligible applicant will receive an automated email at the 60-day mark that informs them of their potential eligibility and provides them with the opportunity to affirmatively respond that they would like to receive additional assistance.

When an applicant responds to the automated email requesting additional assistance, their case moves into the *Recertification Submitted* status. From that status, an Eligibility Specialist (ES) will promptly move the case into one of two subsequent statuses: *PC Recertification Submitted* or *SP Recertification Submitted*. For administrative efficiency, jurisdiction will be determined by the area that processed the original submission. Once the case undergoes ES and QA review and determined to be complete and eligible for additional assistance it is then moved into either *PC Recertification Compliance* or *SP Recertification Compliance*.

Once a case is approved for payment by Pinellas County/City, the case changes status to *PC Payment Pending Audit* or *SP Payment Pending Audit*, and then changes status again to *PC Paid* or *SP Paid*, depending on the funding jurisdiction.

For cases not approved for recertification the applicant is notified of their ineligibility based on program policies and procedures.

2.4.2 Order of Review

Recertifications are not prioritized over initial applicants. They are processed according to priority status as they are received.

2.4.3 Additional Required Documentation

Recertifications are reactivations of existing cases. Although documentation of eligibility has already been provided in the case file for initial assistance, specific additional documentation is required for recertification.

- i. Income: Applicants who submitted income documentation by providing an IRS Form 1040, or categorical eligibility (benefit letter) are not required to provide additional documentation of income. Applicants qualified through other means, such as earnings statements, 1099-G or

- W-2 forms, or self-attestation alone must provide updated income information to recertify for additional months of assistance.
- ii. Lease: Applicants with an active lease that extends through the period for which assistance is requested are not required to provide additional lease documentation. If the lease expires prior to last month for which assistance is requested, a renewed lease or a month-to-month lease addendum must be provided.
 - iii. New Lease: Applicants requesting recertification who have moved must provide documentation of the new lease. The new landlord will be invited to complete an application and provide necessary documentation. Original landlord will be disassociated from tenant application and new landlord will be associated. Changes in landlord associations will be documented in the audit log.
 - iv. Rent Ledger: An updated rent ledger for all recertifications involving any request for arrears rental assistance.
 - v. Utilities: If the applicant is seeking additional utility assistance, a current bill must be provided.
 - vi. Other Documentation: If the household composition has remained the same (i.e. no members have joined or left the household) since the initial application, no further documentation besides the items listed in this policy is required for recertification.

2.5 Appeals Procedure

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

2.5.1 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, and
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.

Effective 6/27/22, all denials will be considered final and there will be no opportunity to appeal. Applications denied prior to 6/27/22 will have 30 days from denial notification to submit an appeal. Appeals may be emailed to ERAPappeals@pinellascounty.org. The process for appealing a response will be provided in a written response to each applicant who submits a concern, suggestion, or request.

2.5.2 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.

2.5.3 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
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.orgThe 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.