

# Greene County Emergency Rental Assistance

## *Policies and Procedures*

*Version: 04262021*

The following listing clarifies the County's efforts to comply with Federal Award Number ERA0293. Nothing in this policies and procedures document is meant to provide direction contrary to the terms and conditions of the grant award or requirements provided for in current and future Treasury guidance and frequently asked questions documents. In all cases, grant and Treasury requirements supersede directions provided here within and allowable to the sub-recipient.

The general structure of the Greene County Emergency Rental Assistance program places the County in the role of a coordinator, while community agencies, with Federal rental assistance experience, collaborate with the County to provide direct services to our residents. This partnership is formed by the execution of a sub-recipient agreement. Each sub-recipient is asked to accept the same terms and conditions of the grant that the County has accepted and to do what is necessary to assist the County in complying with the requirements. No additional requirements are placed on sub-recipient members.

These policies and procedures have been developed by the entire Community Partnership Group, herein referred to as CPG. The CPG has made an effort to meet virtually weekly since January 26, 2021 and will attempt to do so throughout the program. All questions and any recommended changes to policies and procedures will be communicated and agreed upon during these CPG meetings. Since the Greene County Commission is the official grant recipient, all recommendations will be brought to the Commission for final approval. The Greene County Commission has appointed Budget Officer Jeff Scott to represent the County within the CPG. The CPG has elected said Budget Officer as the Chairperson of the group to coordinate the group efforts and meetings.

The CPG has met and established initial capacity assessments for the ability to provide services to our citizens. Each of the six sub-recipient groups, herein referred to as partners, has determined a volume of applications they could process. Further, based on a four-month average amount of rent and utilities, the partners have confirmed that they can perform this activity within the up to 10% guidelines for administrative services.

On February 9, 2021, Commission approved the initial capacity assessments of the CPG and a funding commitment for each of the partners amounting to 83.5% of the grant funds. This approval included the initial funding amounts for each partner, totaling 33% of the grant funds, and established replenishment triggers based on partner undocumented remaining funds. The remaining 16.5% of funds are held in reserve and will be allocated based on a review of partner progress on the initial application volume goals. Three of the six partners have indicated an ability to expand capacity to distribute the remaining funds.

The County's award equates to 45% of the per capita proportional share of the Funds allocated to the State of Missouri. The remaining 55% of our citizen's share of funds were awarded to the State of Missouri. It is the County's goal to disburse the majority of our award as quickly as possible. The County's desire is to be able to continue our program using the 55% of funds that were awarded to the State of Missouri. If the County cannot become a sub-recipient of those funds, then we will work toward creating a smooth transition to allow Greene County Citizens to apply for State Funds and allow local agencies to apply to execute case management services on behalf of the Missouri Housing Development Commission (MHDC). The MHDC is the sub-recipient of the \$323M+ funds the State of Missouri was awarded.

The County has developed a secure web interface for reporting, collecting, and checking for duplication of services. The interface will report the primary applicant name, unit address, household income and other statistics, amounts of award per category, time frame the award represents, and other minimum required information as outlined by the US Treasury in FAQ #14.

The County Commission will be provided status reports on a weekly basis. These reports will consist of a summary of the information entered into the interface, any administrative claims documented by partners, a recap from the County's Project Accounting module delineating the amount of funds distributed to partners, the amounts of funds disbursed by partners, and the resulting remaining funds held by partners. This weekly summary will be made available to the public on the Greene County Emergency Rental Assistance website <https://www.greenecountymo.gov/era>. In addition, the County Budget Office will be using the web interface information to upload files necessary to regularly update the MHDC. This will keep local residents eligible to participate in State awarded emergency rental assistance funds. The County's Budget Office will also utilize this information to comply with US Treasury reporting requirements. This information is kept in a secure manner and any release of information, other than to the MHDC or US Treasury, will be subject to review and redaction by the County Clerk's Office.

The partners, while being comprised of six different agencies, will be using CPG approved materials in administering their allocation of funds. This approach is necessary for the coordination and standardization of the disbursement process.

## **Policy issues related to US Treasury Frequently Asked Questions Revised February 22, 2021**

**FAQ #1 This point directs grantees to document their policies and procedures for determining a household's eligibility.** Eligibility is determined based on the terms and conditions of the grant award, US Treasury guidance, and specific policy decisions listed under FAQ #3 and FAQ#5. **Procedures for determining the prioritization of households.** Issues concerning prioritization of households are addressed below in FAQ #22. **Controls to ensure compliance and prevent fraud.** Weekly aggregation of data and reporting to the County Commission and community. Reporting to the US Treasury and the MHDC, the State sub-recipient. Independent Single Audit of the program by the County's external auditor. **When attestations from the applicant, without further documentation, is allowed to determine any aspect of eligibility or the amount of assistance.** Only instances specifically allowed in US Treasury frequently asked questions dated February 22, 2021 and instances specifically addressed in this policy under FAQ #3 and FAQ #5.

**FAQ #3 This point directs that policies include procedures addressing how they will determine the presence of unsafe or unhealthy living conditions and what evidence of risk to accept in order to support their determination that a household satisfies this requirement.** The County recognizes that these funds are not only provided to keep families in their households, but that the funds are allowed to help transition eligible families from unsafe environments to safe living conditions. The following conditions can be considered unsafe or unhealthy living conditions: improper building construction or poor maintenance of living quarters, buildup of animal or human waste, insect and/or vermin infestations, non-functional utilities such as water, gas, or electricity, or broken appliances such as furnaces and stoves.

**FAQ #5 This point directs that policies include examples of other reasonable documentation of rental amounts in lieu of a written lease and the amount due.** The County prefers a signed lease either provided by the applicant or the landlord. In the absence of a lease, an attestation of the regular rent amount needs to be provided by the applicant and/or the landlord but preferably both. The attestation must be supported by any of the following documents that evidence the amount of the rental payment: bank statements or check stubs showing past payments made. Without documentation the grantee is only authorized to pay assistance up to a monthly maximum of 100% of the greater of the Fair Market Rent for the area in which the applicant resides, as available at <https://www.huduser.gov/portal/datasets/fmr.html> . The amount of rental arrearages will be attested to in the application and confirmed by the attestation of the landlord on the landlord voucher.

**FAQ #7 This point directs grantees to adopt policies that govern in what circumstances when covering of internet services would be appropriate.** In many cases, internet service is a vital service. In those cases where such service is considered vital, partners are allowed to disburse for internet services if evidence of the bill, invoice, or payment to the provider is retained. Internet services are deemed vital when they are the only method available for distance learning, telework, telemedicine, or obtaining government services. The specific reason for the determination must be stated in the Assistance Approved section of the application and the amount while being included as part of the utility totals will also be separately noted on the application. These requests will be treated on an exception basis and not be part of the general public education about the use of funds.

**FAQ #22 This point requires a prioritization of assistance for households with incomes less than 50% of area median income or households with one or more individuals that have not been employed for the 90-day period preceding the date of application.** As previously stated, the County's goal is to get the awarded funds to those that qualify for assistance as quickly as possible. Further, the County desires to be allocated the remaining 55% per capita share of funding from either the State of Missouri or the MHDC to continue our program. If the County cannot become a sub-recipient of those funds, then we will work toward creating a smooth transition to allow Greene County Citizens to apply for State Funds and allow local agencies to apply to execute case management services on behalf of the Missouri Housing Development Commission (MHDC). This does not mean that the County is willing to ignore this point of prioritization of assistance. To this end, the County will report on the status of awards to households with incomes less than 50% of area median income. If the level of participation by this group is considered too low, the CPG will implement marketing efforts specifically targeted to increase participation.

The Median Family Income is released by HUD for the Springfield, MO HUD Metro FMR Area and is updated at least annually (typically in April of each year). The County will adopt newly published rates as of the first day of the month following notification of any such change in Median Family Income for our fair market rents area.

## **Policy issues related to US Treasury Frequently Asked Questions Revised March 26, 2021**

**FAQ #26 Use of Financial Assistance funds for hotels or motels.** The guidance allows for payments for hotels or motels to be included in financial assistance (90% category) as other expenses related to housing incurred. Guidance further states that it must be COVID-19 related, a temporary or permanent displacement without a residence elsewhere. In addition, total months of assistance still cannot exceed 12 months (plus an additional three months if necessary to ensure housing stability), and the documentation of the hotel or motel stay is provided and meets Treasury guidance and County policy. The cost of the hotel/motel stay cannot include incidental expenses charged to the room. The County incorporates the following policy guidelines in addition to Treasury guidance.

A plan must be documented for the transition from hotel/motel stays to a stable rental environment. This plan should be limited to up to two months of hotel/motel stays. The client should enter case management to ensure adherence to the plan. Hotel/motel stay expenses are to be reported as Other Expenses under financial assistance, while case management expenses will be reported as Housing Stability.

**FAQ #29 This policy recognizes and interprets the Treasury's changes in the initial terms of the contract.** Total Administrative Costs are limited to no more than 10% of the awarded amount. In addition, when administrative costs are separately allocated to Financial Assistance and Housing Stability Services, total Housing Stability Services and related administrative costs are limited to no more than 10% of the awarded amount. The allocation method will be based on actual use of resources and in cases where use cannot be determined 90% of administrative costs will be allocated to Financial Assistance and 10% of costs will be allocated to Housing Stability Services.

This document is meant to be a living document and updates and clarifications will be provided as issues and needs arise. In particular, updates in requirements from the US Treasury and MHDC will be addressed as they are issued. The County also recognizes that as our partners open up the application process, other policies and procedures may need to be developed.

Adopted by Greene County Commission on: April 27, 2021