



HALL COUNTY GEORGIA  
EMERGENCY RENTAL ASSISTANCE GRANT  
PROGRAM POLICIES

Administered by:

## Emergency Rental Assistance Program Policies and Procedures Revisions History

Version	Effective Date	Description
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## Overview

The Emergency Rental Assistance Program (ERAP) was established by section 501 of Division N of the Consolidated Appropriations Act, 2021 (Act). The Act allocated \$25 billion to the U. S. Department of the Treasury (Treasury) to provide funds directly to states, territories, local governments, and Indian tribes for households that are unable to pay their rent and utilities due to the financial impacts of the COVID-19 pandemic. Hall County, GA received \$6,153,845.20 for the Emergency Rental Assistance Program.

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

This Handbook outlines the Hall County, GA Emergency Rental Assistance Program requirements for eligible applicants through guidelines, and the administration requirements through policies and procedures. Handbook users may include potential applicant households, property owners, management agents, Hall County staff, as well as staff or agents of the U.S. Department of the Treasury, including the Office of Inspector General.

## Authorization and Source of Funds

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

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

## Policies

### Program Outreach and Engagement

The program will develop a Communication Plan that creates awareness of the Emergency Rental Assistance program to a specific targeted audience using the appropriate mediums in a timely manner. This strategic communication plan and recommended outreach efforts should ensure the Program effectively reaches the following applicants:

- Households under 50% AMI
- Households under 80% AMI
- Landlords

The communications outreach program should include a clear, concise action plan for communications and information sharing across the non-profit organizations and most importantly, the community.

The basic Program Explanation Script could include “The Hall County Emergency Rental Assistance program is a public relief program providing rent funds to County residents at risk of eviction because of COVID-19. Households in Hall County who have individuals qualified for unemployment benefits, incurred significant costs, or experienced other financial hardship due to the COVID-19 pandemic, are highly encouraged to apply. Call 1-855-718-4630 or go to [www.hallcounty.org/RentalAssistance](http://www.hallcounty.org/RentalAssistance) to begin the application process.”

The above 3 sentences can be broken down into three bullet points for mailers and other forms of outreach where clarity and conciseness are most important.

### Eligible Program Costs

The Emergency Rental Assistance will provide up to 12 months of rental assistance, for a maximum grant award of \$12,500.00. All past due rental arrears must be paid before payments for prospective rents will be paid.

Program assistance will pay 100% of the past due rental costs, including late charges and other fees as specified in the lease.

Funds may only be used for the following costs for households obligated to pay rent on a residential dwelling for:

- Current month and future rent\* not to exceed 90 days.
- Past due rents.

- Other expenses related to housing incurred due to COVID-19, which include.
  - Reasonable late fees that have accrued.
  - Relocation expenses if a household has been temporarily or permanently displaced due to COVID-19.
  - Reasonable security deposit fees if a household has been temporarily or permanently displaced due to COVID-19.

Any past due amounts must be covered prior to assistance for current or future costs being approved.

### **Ineligible Costs**

Any services not explicitly listed in the Eligible Use of Funds section shall be deemed ineligible. This includes (but is NOT limited to) mortgage payments, HOA fees, taxes, insurance, cable, telephone, cell phone, or home security systems.

### **Period of Assistance**

Applicants may request assistance for rent and other expenses related to housing incurred due to COVID-19 from March 13, 2020 through December 31, 2021.

### **Priorities for Assistance**

From April 6, 2021 to May 6, 2021, the following application types will be prioritized:

- At or below 50% AMI, or
- An applicant who is at or below 80% AMI, where one or more household members have been unemployed for more than 90 days.

For the first 4 weeks of the program or until all priority applications are complete, whichever occurs first, only priority applications are processed (at or below 50% AMI or unemployed for more than 90 days). Once all priority applications have been processed, and/or the first 4 weeks have passed, applications will be processed in order of their receipt.

### **Eligibility Criteria**

#### **Household Eligibility Criteria**

A household consists of all occupants who reside in the residential dwelling unit fulltime, including all adults and children. A household can be an individual, a family or a group of unrelated people who reside in the residential dwelling unit full time and have no other place of residence.

To be eligible an applicant must:

1. Have a household gross income at or below the low-income limits.

Household Size	1	2	3	4	5	6
<b>50% AMI Level</b>	\$25,250	\$28,850	\$32,450	\$36,050	\$38,950	\$41,850
<b>80% AMI Level</b>	\$40,400	\$46,150	\$51,900	\$57,650	\$63,300	\$66,900

2. Have at least one household member who:
  - Is qualified for unemployment benefits, **OR**
  - Has experienced a reduction in household income, incurred significant costs, or has experienced a financial hardship due to COVID-19.
3. Demonstrate housing instability or a risk of becoming homeless.

All household residents do not have to be listed on the lease.

### Property Eligibility Criteria

To be consider eligible for the program, the property must be a legal residential rental unit. The residential rental property must be located within in the jurisdictional boundaries of Hall County, GA.

Under the legal doctrine called the “implied warranty of habitability”, the Landlord is required to keep rental properties livable and comply with local housing codes by taking care of important repairs.

### Landlord Eligibility Criteria

For a landlord to receive the rent subsidy the landlord will be required to comply with federal, state, and local governing law including:

- Provide evidence that you are authorized to sign on behalf of the property owner.
- a completed W-9 form, including a Social Security number or Employer Identification Number.
- a signed Landlord / Tenant Agreement (Lease).
- Provide timely information for processing the payment.

### Utility Provider Eligibility Criteria

Utilities are not a part of this program.

## **Income Determination**

Income determination is a critical component of household eligibility. Applicants must report the total income for all adult household members 18 years or older, as well as provide documentation to support the income stated.

The Act provides two options for reporting income for the household:

- (1) the household's total income for calendar year 2020, or
- (2) the household's total monthly income at the time of application.

Regardless of the option selected, whether 2020 income or monthly income at the time of application, all income sources must be provided and documented.

If an applicant household's income cannot be verified due to the impacts of COVID-19, if the income is paid in cash, if the applicant needs accommodation for disabilities or extenuating circumstances related to COVID-19, or if the applicant has a lack of technological access, the ERA program is responsible for determining the total applicant household income for qualification.

Applicants may utilize the Categorical Eligibility available for applicants who have had their total household income verified as of January 1, 2021 or later to be at or below 80 percent of the AMI by another local, state, or federal governmental agency assistance programs. This Categorical Eligibility is documented by a determination letter from the government agency for the program, provided the income determination was made on or after January 1, 2021.

The steps of determining household income are as follows:

- Identifying all income sources to be included and excluded for the household.
- Verify all income sources are documented.
- Request additional information, documentation, or clarification, if necessary
- Reviewing all income documentation provided
- Calculate annual income based on number of months reported by applicants.
- Verifying total household income meets the criteria of being at or below 80 percent AMI.

Results of the determination will be maintained in the applicant 's file.

2020 and 2021 Stimulus payments are not considered income under IRS guidelines.

## Income Limits

The link for the *Fiscal Year 2021 Income Limits found under the heading of "Access Individual Median Family Income Areas"* is <https://www.huduser.gov/portal/datasets/il.html>

FY 2020 Income Limit Area	Median Family Income <b>Explanation</b>	FY 2020 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Gainesville, GA MSA	\$75,500	Very Low (50%) Income Limits (\$) <b>Explanation</b>	25,250	28,850	32,450	<b>36,050</b>	38,950	41,850	44,750	47,600
		Extremely Low Income Limits (\$)* <b>Explanation</b>	15,200	17,350	21,720	<b>26,200</b>	30,680	35,160	39,640	44,120
		Low (80%) Income Limits (\$) <b>Explanation</b>	40,400	46,150	51,900	<b>57,650</b>	62,300	66,900	71,500	76,100

**NOTE:** Hall County is part of the Gainesville, GA MSA, so all information presented here applies to all of the Gainesville, GA MSA.

## Documentation of Rent and Rental Arrears

The program must obtain, if available, a current lease, 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 lease, documentation of residence may include evidence of paying utilities for the residential unit, an attestation by a landlord who can be identified as the verified owner or management agent of the unit, or other reasonable documentation as determined by the grantee. In the absence of a signed lease, 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.

## Preventing Assistance Duplications

The Act requires that assistance being provided for rent does not duplicate any other assistance, including federal, state, or local assistance for those same costs. Applicants must disclose all rental assistance they have received, will receive, or have applied for from any sources for the period covered in their application to the ERAP.

Federally funded monthly housing assistance, in the form of rental subsidy, include, but are not limited to the Housing Choice Voucher, Public Housing, Project-Based Rental Assistance, or Tenant-Based Rental Assistance programs.

An eligible household that lives in a federally subsidized residential unit may receive ERA assistance, provided that the ERA funds are not applied to the costs that have been or will be reimbursed with any other federal assistance.

## Written Attestation

In the rare occasion that an applicant is able to provide satisfactory evidence of residence, but cannot provide adequate documentation of the rental obligation (lease or other listed documentation), the applicant may provide a written attestation, and the amount of assistance will be limited to an amount not to exceed a monthly amount that is no more than 100% of the greater of the Fair Market Rent or the 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>. The amount of assistance will be the lesser of the amount requested or the limit of Fair Market Rent or the Small Area Fair Market Rent.

### The FY 2021 Gainesville, GA MSA FMRs for All Bedroom Sizes

Final FY 2021 & Final FY 2020 FMRs By Unit Bedrooms					
Year	<u>Efficiency</u>	<u>One-Bedroom</u>	<u>Two-Bedroom</u>	<u>Three-Bedroom</u>	<u>Four-Bedroom</u>
FY 2021 FMR	\$761	\$834	\$951	\$1,254	\$1,402
<u>FY 2020 FMR</u>	\$700	\$789	\$898	\$1,195	\$1,315

The applicant must also attest that no member of the household has received, has applied for, nor do they anticipate receiving, any other sources of public or private subsidy or assistance for the rental costs covered by the attestation. This limited payment is intended to provide the most vulnerable households the opportunity to gather additional documentation or negotiate with landlords to avoid eviction.

If a written attestation is accepted, assistance may only be provided for three months at a time. Further requests will require evidence that the rent is owed consistent with the above after three months to provide additional assistance to such a household.

## Landlord Non-Participation

It is expected that rental assistance can be provided most effectively and efficiently when the landlord participates in the program. Applications that do not include landlord (or tenant) participation will be denied.

As required by the Act, grantees must make reasonable efforts to obtain the cooperation of landlords to accept payments from the ERA program. Outreach will be considered complete if:

1. a request for participation is sent in writing, by mail, to the landlord, and the addressee does not respond to the request within 14 calendar days after mailing.
2. the grantee has made at least three attempts by phone, text, or e-mail over a 10 calendar-day period to request that the landlord participate in the program: or,
3. a landlord confirms in writing that the landlord does not wish to participate. The final outreach attempt or notice to the landlord must be documented. The cost of contacting landlords would be an eligible administrative cost.

### **Application Criteria**

If an applicant needs assistance in completing their application, they can contact 855-718-4630 to make an appointment to receive assistance. The applicant must appear and provide proof of identity along with other required program documentation. The applicant may provide a Power of Attorney in a form that is acceptable in the State of Georgia or they may complete a Communications designee document that will allow the Program to accept documentation and to discuss program details with a person designated by the applicant.

The Program will automatically check each application to ensure that it is not a duplicate. Unless roommates apply under two separate applications, because they are under separate leases, only one application is allowed per each address and unit number.

If an applicant needs to make a change to their application, they must contact the Case Manager to do so.

### **Incomplete Applications and Response Standards**

1. Landlord response
  - If a request for participation is sent in writing, by mail, to the landlord, and the addressee does not respond to the request within 14 calendar days after mailing; or if the Program has made at least three attempts by phone, text, or e-mail over a 10 calendar-day period to request the landlord participation; or if a landlord confirms in writing that the landlord does not wish to participate, then the application will be denied.
2. Tenant response
  - If a request for participation is sent in writing, by mail, to the tenant, and the addressee does not respond to the request within 14 calendar days after mailing; or if the Program has made at least three attempts by phone, text, or e-mail over a 10 calendar-day period to request the tenant provide missing documentation or information; or if a tenant confirms in writing that they do not wish to participate then the application will be denied.

## **Rental Assistance to Temporarily Displaced Households**

If a household can provide evidence that they have been displaced as a result (directly or indirectly) of the COVID-19 outbreak, the Hall County ERAP may provide payments for a hotel or motel room occupied by a temporarily displaced household. Households must also provide evidence that they have been denied under the HUD Emergency Solutions Program or FEMA Public Assistance. Payments will be made on a bi-weekly basis and the applicant will recertify monthly that they have been unable to locate long term housing.

## **Recertification Process for Additional Assistance**

Assistance provided to households for prospective, or future, rents is limited to three months and is based on an application by or on behalf of the household. If the household needs additional assistance, subject to the availability of funds, they must request the additional assistance.

Households will be required to provide updated total household income if the household chooses to provide monthly household income information instead of providing the household's income as the total income for the 2020 year. Income information must be updated to reflect the total household income received for the 60 days prior to the request for additional assistance.

The total number of months of assistance provided to any household may not exceed 12 months or \$12,500.00 subject to the availability of funds.

## **Payment of Funds**

The Hall County Grants Division of the Financial Services Department will enter the UnQork system of record every two weeks (approximately) initially and then monthly as needed and will be able to access a file of all approved disbursements. This file will include the Landlords who are receiving the payment, their W-9, the tenants in whose behalf they are receiving the payments and the months they are receiving payment for. They will enter the Landlords into the County vendors system, including the W-9 for the Landlord. The County will take each file and use it to follow normal County Process for cutting and disbursement of checks. (See County disbursement processes and requirements for details).

Hall County will cut checks to Landlords and will solely manage the disbursement of program funds in accordance with the Hall County Accounts Payable Administrator Standard Operating Procedures for Fiscal Year 2021, and all Landlords will be set up as vendors in accordance with the Hall County New Vendor Setup and instructions, both of which by reference is made a part hereof.

The County will issue 1099's to the Landlords at the end of each year.

If in any instance the Landlord refuses to participate in the program and the program has made the contact attempts as described herein, the application will be denied.

## **Decision process**

Case Managers will process the applications for assistance, both for applications submitted by or on behalf of eligible households. Once all processes of application review have been completed (including receiving and reviewing all documentation; eligibility criteria; prioritization criteria; household income has been determined; amounts of rent, and other expenses related to housing incurred due, either directly or indirectly, to the COVID-19 outbreak have been confirmed; and payment information has been received by the landlord and property ownership has been verified), applications will be recommended for approval or denial and forwarded to the Case Management Supervisor for final approval.

## **QA/QC**

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

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

## **Notification of approval/denial**

Applicants will receive determination notice via email that their application has been approved or denied. This notice will be provided through the program platform. If an application is denied, the applicants will be notified of their right to appeal.

Once an applicant has applied and been approved for all rent arrears, and up to 3 months prospective assistance, additional assistance for prospective rents (not to exceed a total of 12 months assistance) must be submitted. Additional prospective assistance is not guaranteed or automatically provided; the additional assistance must be validated, along with recertification of total household income.

## Appeals Process

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

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

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

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

Applicants may only appeal once; decisions made by the Appeals Committee will be final.

## False Claims

Any person or entity (including its employees and affiliates) that enters into an agreement with the Hall County ERAP that witnesses, discovers evidence of, receives a report from another source, or has other reasonable basis to suspect that fraud, misuse of funds or embezzlement has occurred must immediately make a report through the following channels:

- Van Stephens, [vstephens@hallcounty.org](mailto:vstephens@hallcounty.org) or call 770-535-8288
- The Treasury Office of Inspector General hotline at 800-359-3898

An individual filing a complaint may request the complaint to be handled confidentially if they believe disclosing their identity may create a hardship or place them in danger. If confidentiality is elected, it is suggested but not required to provide as much contact information as they are comfortable if additional details are needed. Filing an anonymous complaint may limit the ability of conducting a complete investigation.

A false claim is any action taken by a tenant, landlord, property manager, owner, or any service provider that knowingly:

- Submits an application with any fraudulent information or documentation.
- Overcharges for a cost or service.
- Misrepresents the amount of rent, or housing services due.

- An assistance request that is ineligible.
- Submits an application for assistance that is not owed.
- Submits an application for assistance that has been paid.
- Fails to report rent, costs or services that have been paid; and/or
- Fails to repay assistance for costs or services reimbursed from other sources.

Actions include but may not be limited to the following:

1. Seek legal counsel, who will provide the protocol for conducting an investigation, preserve any evidence, and advise on the determination of the appropriate legal action to be taken.
2. Communicate with the responsible individuals within Hall County, ensuring only those that have a role in the investigation and decision-making actions are involved, including the content and timing of information to be shared.
3. Engage an experienced and credentialed forensic accountant to conduct an investigation. This will identify the scope, number of losses and preserve evidence, as well as providing interviews, removing the burden of investigation off management.
4. Preserve evidence from sources that may include copies of electronic backup, network, hard drives, laptops, etc.
5. Place employees on leave and restrict access (if employees are suspected of being involved).
6. Document all efforts and maintain records of the activities from the point of discovery of fraud, protocol taken, and outcomes.

## **Administrative Costs**

Administrative costs are those expenditures for the overall administration of, and that are required by, the ERA Program. Sometimes called indirect or overhead costs, administrative costs are those operational expenses that cannot be directly charged to a specific project or program but are for the overall administration and management of the funding.

Administrative costs include general management, coordination such as providing local officials and citizens with information about ERA, preparing budgets and schedules, preparation and submission of reports and other Treasury-required documents, and monitoring and oversight activities. Administrative costs may also include training for staff, contractors or community partners who will administer or participate in the program, as well as case managers who will serve program participants, if this training is directly related to learning about the ERA program.

Administrative costs do not include the costs of issuing financial assistance, providing housing relocation and stabilization services, or carrying out eligible data collection and evaluation activities, such as staff salaries, and other operating costs.

All administrative costs and time charged to the ERA Program must be documented through the appropriate means (e.g., timesheets and attendance records identifying ERA and other programs, invoices, receipts, etc.).

Direct costs are those that can be identified specifically with a specific cost objective, such as a grant, contract, project, or activity. Direct costs include wages; fringe benefits allocated to the direct labor employees; consultant services; travel; materials, supplies, or equipment for use on a specific grant or contract; and communications costs for a specific grant, award, activity, or contract.

Indirect costs are those expenses that are necessary to conduct business and perform the required activities but are not readily identified with a particular grant or contract. These costs include rent, utilities, accounting and human resource personnel, and other operational costs. Documentation for indirect costs would include an approved Indirect Cost Rate.

An indirect cost rate is simply a mechanism for determining fairly and conveniently within the boundaries of sound administrative principle, what proportions of departmental/organization administration costs each program should bear. An indirect cost rate represents the ratio between the total indirect costs and benefiting direct costs, after excluding and or reclassifying unallowable costs, and extraordinary or distorting expenditures. (i.e., capital expenditures and major contracts and subgrants). The indirect costs in the numerator of the equation should bear a reasonable relationship to the direct costs from the denominator. This will allow for each program or activity represented in the direct costs base to assume a fair share of indirect costs when the rate is applied.

Documentation supporting all administrative costs, whether direct or indirect, must be maintained and available for review by program staff, Treasury, the Office of Inspector General, or auditors.

### **Applicant Confidentially**

Employees and agents of the Program will not disclose any applicant's personal confidential information as part of the program. All confidential information of applicants will be kept in a password protected electronic file and unavailable to persons outside of the program. At all times, the Program will abide by all requirements stated within the Privacy Act of 1974 as amended. If a request for public records related to the program is received, only non-confidential information, as verified by the Program, will be provided. The Program shall follow its Personally Identifiable Information (PII) policies and procedures to ensure all records containing personally identifying information of any person or family who applies for and/or receives assistance is kept secure and confidential.

## **Personally Identifiable Information**

Personally Identifiable Information (PII) is defined as:

Any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means. Further, PII is defined as information:

- That directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or
- By which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors. Additionally, information permitting the physical or online contacting of a specific individual is the same as personally identifiable information. This information can be maintained in either paper, electronic or other media.

Program staff are reminded that safeguarding sensitive information is a critical responsibility that must be taken seriously at all times. The program specifies the following security policies for the protection of PII and other sensitive data:

- It is the responsibility of the individual staff member user to protect data to which they have access.
- Staff having access to personal information shall respect the confidentiality of such information and refrain from any conduct that would indicate a careless or negligent attitude toward such information. Staff also shall avoid office gossip and should not permit any unauthorized viewing of records contained in the system of records. Only individuals who have a "need to know" in their official capacity shall have access to such systems of records.

The loss of PII can result in substantial harm to individuals, including identity theft or other fraudulent use of the information. Because program staff may have access to personal identifiable information concerning individuals and other sensitive data, they have a special responsibility to protect that information from loss and misuse.

With these responsibilities Program Managers should ensure that their staff safeguard program information to which their employees have access at all times. Program Managers should ensure their employees are aware of their responsibilities regarding the protection of PII in the Program. In addition to the forgoing, if employees become aware of a theft or loss of PII, they are required to immediately inform their Program Manager.

## Reporting Requirements

At a minimum, to ensure that Treasury can fulfill its quarterly reporting requirements under section 501(g) of Division N of the Act and its ongoing monitoring and oversight responsibilities, the Program will collect from households and retain records on the following:

- Address of the rental unit.
- For landlords, the name, address, and Social Security number, tax identification number (TIN), Employer Identification Number (EIN), or DUNS number.
- Amount and percentage of monthly rent covered by Program assistance.
- Total amount of each type of assistance provided to each household (*i.e.*, rent, rental arrears, and other expenses related to housing incurred due directly or indirectly to the COVID-19 outbreak).
- Amount of outstanding rental arrears for each household.
- Number of months of rental payments for which ERA assistance is provided.
- Household income and number of individuals in the household; and
- Gender, race, and ethnicity of the primary applicant for assistance.

The Program must also collect information as to the number of applications received to be able to report to Treasury the acceptance rate of applicants for assistance. The Program will comply with the requirement in section 501(g)(4) of Division N of the Act to establish data privacy and security requirements for information they collect: see Confidentiality section.

The CFDA listing number assigned to the Program is 21.023.

## Monitoring

The Program will create a separate plan that covers monitoring objectives and activities, review topics, assessments, and follow-up; and will be used for performance and compliance monitoring and will assist the Program and any subrecipients to prepare for an audit in the event the program or project, recipient or County is audited by either internal auditors or the Department of the Treasury (Treasury) Office of Inspector General (OIG). The OIG has been tasked with responsibility for monitoring and oversight of the receipt, disbursement, and use of CRF payments.

This Monitoring will be an on-going process used to ensure compliance, including program or project effectiveness with requirements, rules, and regulations.

## Non-compliance

If compliance or performance issues are found, the Program will be provided an outline of the identified deficiencies and recommendations of corrective actions. The Program or subrecipient will be asked to submit a corrective action plan within a defined duration. Follow

up actions will be scheduled to address the progress of the resolution and technical assistance will be provided.

## **Closeout**

Closeout is the process used to determine that all CRF and program/project requirements have been completed. Once it has been determined that all requirements have been met and funds expended, the closeout process is initiated, and the closeout procedures contained in this Plan should be followed.

The Program will develop a closeout process that applies to programs, projects executed by subrecipients or other pass-through entities, which are ready for closeout, when all applicable administrative actions and all required work of the award have been completed.

**Program documentation, including governing agreements, financial records, supporting documentation used to justify costs (receipts, timesheets, etc.), and all other essential records should be maintained in the Program file or System of Record for a period of six years.** Subrecipients or other pass-through entities are expected to maintain the Program files or System of Record for the same time-period.

## **Record Keeping**

Accurate, complete, and orderly records that support the decisions, actions, expenditures, correspondence, outcomes, reports, compliance, and other programmatic accomplishments must be maintained for a minimum of six (6) years after the final expenditure of the federal ERA Program funds by the Hall County Grants Division of the Financial Services Department.

All ERA Program recipients shall maintain and make available to the Treasury OIG upon request all documents and financial records sufficient to establish compliance with the Act. Records supporting compliance with the Act include but are not limited to:

1. General ledger and subsidiary ledgers used to account for (a) the receipt of Emergency Rental Assistance Program payments and (b) the disbursements from such payments to meet eligible expenses related to the public health emergency due to COVID-19.
2. Payroll, time records, human resource records to support costs incurred for payroll expenses related to ERA costs.
4. Receipts of purchases made related to ERA.
5. Contracts and subcontracts entered into using Emergency Rental Assistance Program payments and all documents related to such contracts.
6. Grant agreements and grant subaward agreements entered into using Emergency Rental Assistance Program payments and all documents related to such awards.
7. All documentation of reports, audits, and other monitoring of contractors, including subcontractors, and grant recipient and subrecipients.

8. All documentation supporting the performance outcomes of contracts, subcontracts, grant awards, and grant recipient subawards.
9. All internal and external email/electronic communications related to use of Emergency Rental Assistance Program payments; and
10. All investigative files and inquiry reports involving Emergency Rental Assistance Program payments.

Records shall be maintained for a period of six (6) years after final payment is made using Emergency Rental Assistance Program funds. These record retention requirements are applicable to all prime recipients and their grantees and subgrant recipients, contractors, and other levels of government that received transfers of Emergency Rental Assistance Program payments from prime recipients.

## References

Link to the Consolidated Appropriations Act:

[BILLS-116hr133enr.pdf \(congress.gov\)](#)

Subtitle A – Emergency Rental Assistance

[Excerpt\\_Section-501\\_PL-115-260.pdf \(treasury.gov\)](#)

Link to U. S. Treasury Frequently Asked Questions:

[ERA-Frequently-Asked-Questions\\_Pub-2-22-21.pdf \(treasury.gov\)](#)

Department of Treasury, Office of the Inspector General Coronavirus Relief Fund Frequently Asked Questions

[Department of the Treasury Office of Inspector General Coronavirus Relief Fund Frequently Asked Questions Related to Reporting and Recordkeeping \(Revised\)\(OIG-CA-20-028R\)](#)

## Training Section

See Training Manual for details of staff training.

## Sample Documents

Sample documents are in the Guidelines manual.