



# ST. JOHNS COUNTY EMERGENCY RENTAL ASSISTANCE GRANT PROGRAM POLICIES

Administered by:  
St. Johns County  
Health and Human Services  
200 San Sebastian View  
St. Augustine, FL 32084

[St. Johns County Government \(sjcfl.us\)](http://sjcfl.us)

Emergency Rental Assistance Program Policies and Procedures  
Revisions History

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Version 1.0		
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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. St. Johns County received \$7,991,953.00 for the Emergency Rental Assistance Program.

Emergency Rental Assistance Program funding may only be used to provide financial assistance for rent, utility and home energy, 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 St. Johns County 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, utility companies, St. Johns 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 communications plan and recommended outreach efforts should ensure the Program effectively reaches the following applicants:

- Households under 50% AMI
- Household under 80% AMI
- Landlords
- Utility Providers

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 St. Johns County Emergency Rental Assistance Program is a public relief program providing rent and utility funds to County residents at risk of eviction because of COVID-19. Households in St. Johns 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 904-344-3188 or 800-557-7441 or go to <https://stjohns-crr.ungork.io/> 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 and utility assistance, for a maximum grant award of \$5,000.00. No prospective utilities 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. Legal fees will be capped at \$750 and must be included in the signed lease as included in rent.

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

- Past due rents.

- Past due utility or home energy costs; and/or
- 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 reconnection fees if a utility service has been discontinued.
- Reasonable security deposit fees if a household has been temporarily or permanently displaced due to COVID-19.

Utility or home energy costs include separately billed or itemized electricity, gas, water and sewer, trash removal and energy costs, such as fuel oil.

### **Ineligible Costs**

Any services not explicitly listed in the Eligible Use of Funds section will be deemed ineligible by St. Johns County. 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, utilities, home energy, and other expenses related to housing incurred due to COVID-19 from March 13, 2020 through December 31, 2021 or such later date as may be provided by Treasury.

### **Priorities for Assistance**

For the first thirty (30) days from the program launch date, 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.
- Seniors, veterans, disabled persons and families with minor children

For the first 30 days of the program or until all priority applications are complete, whichever occurs first, only priority applications are processed. Once all priority applications have been processed, and/or the first 30 days 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 full-time, 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.

FY 2021 Income Limit Area	Median Family Income <a href="#">Explanation</a>	FY 2021 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Jacksonville, FL HUD Metro FMR Area	\$74,800	Very Low (50%) Income Limits (\$) <a href="#">Explanation</a>	26,200	29,950	33,700	<b>37,400</b>	40,400	43,400	46,400	49,400
		Extremely Low Income Limits (\$)* <a href="#">Explanation</a>	15,750	18,000	21,960	<b>26,500</b>	31,040	35,580	40,120	44,660
		Low (80%) Income Limits (\$) <a href="#">Explanation</a>	41,900	47,900	53,900	<b>59,850</b>	64,650	69,450	74,250	79,050

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

In order to be considered 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 St. Johns County, FL.

### **Landlord Eligibility Criteria**

In order 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.
- Signed Landlord Agreement.
- Provide timely information for processing the payment.

Landlord must agree that all existing eviction actions for non-payment of rent will be canceled.

### **Utility Provider Eligibility Criteria**

Utilities and home energy costs are separately stated charges related to the occupancy of rental property. Accordingly, utilities and home energy costs include separately stated electricity, gas, water, sewer, trash removal and energy costs such as fuel oil. Eligible utility providers are public or private entities.

### **Utility Assistance**

Program funds may be used to pay delinquent utility payments, due no earlier than March 13, 2020, not to exceed twelve (12) months.

The program participant or a member of his/her household must have an account in his/her name with a utility company or proof of responsibility to make utility payments, such as cancelled checks or receipts in his/her name from a utility company.

All payments for utilities and home energy costs must be supported by a bill, invoice, or evidence of payment to the provider of the utility or home energy service.

### **Internet Service**

Internet services is not allowed as a utility.

### **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 that 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.

### 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 2021 Income Limit Area	Median Family Income <b>Explanation</b>	FY 2021 Income Limit Category	Persons in Family							
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		Low (80%) Income Limits (\$) <b>Explanation</b>	41,900	47,900	53,900	<b>59,850</b>	64,650	69,450	74,250	79,050

## **Documentation of Rent and Rental Arrears and Utilities and Utility Arrears**

The program must obtain 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.

All payments for utilities and home energy costs shall be supported by a bill, invoice, or evidence of payment to the provider of the utility or home energy service.

## **Preventing Assistance Duplications**

The Act requires that assistance being provided for rent, utility and/or home energy costs does not duplicate any other assistance, including federal, state, or local assistance for those same costs. Applicants must disclose all rental, utility, and/or home energy assistance they have received, will receive, or have applied for from any sources for the period of time 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.

## **Landlord/Utility Non-Participation**

It is expected that rental and utility assistance can be provided most effectively and efficiently when the landlord or utility provider participates in the program. As required by the Act, grantees must make reasonable efforts to obtain the cooperation of landlords and utility providers to accept payments from the ERA program. Outreach will be considered complete if (i) a request for participation is sent in writing, by mail, to the landlord or utility provider, and the addressee does not respond to the request within 14 calendar days after mailing; (ii) the grantee has made at least three attempts by phone, text, or e-mail over a 10 calendar-day period to request the landlord or utility provider's participation; or (iii) 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. If a Landlord or utility provider will not participate, the application will be denied.

## **Application Criteria**

If an applicant needs assistance in completing their application, they can contact the call center at 904-344-3188 or 800-557-7441 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 Florida, 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
  - 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; (ii) the Program has made at least three attempts by phone, text, or e-mail over a 10 calendar-day period to request the landlord or utility provider's participation; or (iii) a landlord confirms in writing that the landlord does not wish to participate.
2. Tenant response
  - 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; (ii) 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 (iii) a tenant confirms in writing that they do not wish to participate.
3. Utility response
  - a request for participation is sent in writing, by mail, to the utility provider, and the addressee does not respond to the request within 14 calendar days after mailing; (ii) the Program has made at least three attempts by phone, text, or e-mail over a 10 calendar-day period to request the landlord or utility provider's participation; or (iii) a utility provider confirms in writing that they do not wish to participate.

## **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 St. Johns County ERAP may provide payments for a hotel or motel room occupied by a temporarily displaced household. 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. Payments will be made by check and hotel must agree to accept check form the County.

## **Payment of Funds**

The St. Johns County Grants Division of the Financial Services Department or Witt O'Brien's will enter the UnQork system of record 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 requirement details).

St. Johns County will cut checks to Landlords and will solely manage the disbursement of program funds in accordance with the St. Johns County Accounts Payable Administrator Standard Operating Procedures for Fiscal Year 2021, and all Landlords will be set up as vendors in accordance with the St. Johns 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, utilities and home energy, 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 or utility provider), applications will be recommended for approval or denial and forwarded to the Case Management Supervisor for final approval.

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 via email. 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 and utility arrears, additional assistance requests (not to exceed a total of 12 months assistance) must be submitted. 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 Program Lead 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 Program Lead 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 program Lead will be final.

### **False Claims**

Any person or entity (including its employees and affiliates) that enters into an agreement with the St. Johns 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:

- Clerk of Circuit Court and County Comptroller Office of Inspector General Hotline  
866-272-4351

- 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 actions taken by a tenant, landlord, property manager, owner, utility provider or any service provider that knowingly:

- Submitting an application with any fraudulent information or documentation.
- Overcharging for a cost or service.
- Misrepresenting the amount of rent, utility, or housing services due.
- Requesting assistance that is ineligible.
- Submitting an application for assistance that is not owed.
- Submitting an application for assistance that has been paid.
- Failing to report rent, costs or services that have been paid; and/or
- Failing 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 [fill in], 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 experience and credentialed forensic account 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 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 the 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, as long as 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 their 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 files 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 St. Johns County Emergency Rental Assistance Program will 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, subject to the requirements of Florida's public records law.

### **Personally Identifiable Information**

Personal 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 is 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 St. Johns County respect the confidentiality of such information, and refrain from any conduct that would indicate a careless or

negligent attitude toward such information. Staff also St. Johns County 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 St. Johns County 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, in order to ensure that Treasury is able to 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 and utility providers, the name, address, and Social Security number, tax identification number or DUNS number.
- Amount and percentage of monthly rent covered by Program assistance.
- Amount and percentage of separately stated utility and home energy costs covered by Program assistance.
- Total amount of each type of assistance provided to each household (*i.e.*, rent, rental arrears, utilities and home energy costs, utilities and home energy costs 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 and number of months of utility or home energy cost 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 in order 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 assistance 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 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 five years after the final expenditure of the federal ERA Program funds by St. Johns County.

All ERA Program recipients St. Johns County 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:

- 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.
- Payroll, time records, human resource records to support costs incurred for payroll expenses related to ERA costs.
- Receipts of purchases made related to ERA.
- Contracts and subcontracts entered into using Emergency Rental Assistance Program payments and all documents related to such contracts.
- Grant agreements and grant subaward agreements entered into using Emergency Rental Assistance Program payments and all documents related to such awards.
- All documentation of reports, audits, and other monitoring of contractors, including subcontractors, and grant recipient and subrecipients.
- All documentation supporting the performance outcomes of contracts, subcontracts, grant awards, and grant recipient subawards.
- All internal and external email/electronic communications related to use of Emergency Rental Assistance Program payments; and
- 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 \(Revised\)\(OIG-CA-20-028R\)](#)