

Lake County Federal Emergency Rental Assistance (FERA) Program Manual

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FERA BACKGROUND AND PROGRAM OVERVIEW

This program manual provides guidance on program implementation for providers selected as a Lake County Federal Emergency Rental Assistance (FERA) Housing Assistance Provider. This program manual contains four sections:

1. Background and Program Overview
2. Program Rules and Guidance
3. Forms and Documentation Guidance
4. Policies and Procedures

The purpose of the Federal Emergency Rental Assistance (FERA) Program is to provide direct financial assistance and services to Lake County residents who have been financially impacted by the COVID-19 emergency.

While this document is intended to ensure program compliance and consistency across partners, Lake County recognizes that this document may not anticipate the individual circumstances of each applicant. Therefore, Lake County reserves the right to exercise discretion on a case by case basis within the U.S. Treasury rules.

Terms/Definitions

- **Housing Assistance Provider:** For the purposes of this document, Housing Assistance Providers (“Providers”) are organizations that provide direct financial assistance (rental or utility assistance) and other services to applicants, including case management and/or housing counseling.
- **Legal Provider:** For the purposes of this document, “Legal Providers” are organizations that provide legal assistance to applicants, including landlord mediation. Prairie State Legal Services and North Suburban Legal Aid Clinic are Legal Providers.
- **ServicePoint:** The case management platform where all beneficiary information will be entered and tracked for the purposes of program compliance.
- **ServicePoint Referral Network:** ServicePoint may be used to send an electronic referral from one provider to another provider on the network. This functionality is referred to as the ServicePoint Referral Network.

Overview of Process

1. Households must submit an application through the online application form on the County Website at www.LakeCountyIL.gov/renthelp. Applications will be sent directly to the inbox of the provider the applicant chooses.
 - a. Households may call 211, who will answer questions, conduct a pre-screening, and guide applicants to the right provider for them. If the household is likely to be eligible, the 211 call center specialist will direct the household to fill out the application on-line or refer the household to the provider of their choice via a ServicePoint electronic referral. Providers will need to call the household to accept the referral.

2. Providers will add an "Entry" into ServicePoint as soon as they receive an application.
3. Providers will review applications and documentation to determine eligibility.
 - a. Providers will review for prior assistance by checking for Duplication of Benefits in the database according to the Duplication of Benefits procedure.
 - b. Providers will conduct additional outreach or meetings with clients, landlords, or utility companies as needed.
4. Providers will calculate assistance according to program rules.
5. Providers will notify applicants whether they are (i) approved, (ii) denied, or (iii) more information is needed within 10 business days. Notification can happen through a phone call or written notice (email or letter).
6. Providers will add an "Exit" into ServicePoint as applications are approved or denied, within 24 hours of the decision. When an "Exit" is added for an approved application, providers will upload the application's *Application Approval Form* to ServicePoint.
7. Providers will make payments to the landlord and/or utility provider on behalf of eligible households according to the program rules.
8. Providers may provide eligible households with additional services, such as housing counseling, or connections to other services they may need via the ServicePoint Referral Network.
9. Providers will submit reports to Lake County monthly.

PROGRAM RULES AND GUIDANCE

This section provides detailed rules and guidance for administering the FERA Program. Questions and Clarification should be directed to FERA@lakecountyil.gov.

Intake

- A. Intake can occur through any provider or through 211. The 211 call center specialist will guide the client to the provider most appropriate to that client's needs, but the client may ultimately select any provider that can serve them.
- B. All providers will use the same application form.
- C. All providers will enter clients into ServicePoint as soon as they receive an application. Providers must check ServicePoint to ensure that the client is not currently being served (i.e., has an open ServicePoint entry) at another FERA provider.
- D. All providers must ask questions to determine if legal assistance is required. If legal assistance may be required, they will refer to a legal provider. If a client presents at a Legal Provider regarding housing issues, the Legal Provider will refer to a housing assistance provider if financial assistance is determined necessary.
- E. Applications must be submitted to providers electronically. Lake County encourages providers to make reasonable efforts to accommodate applicants who cannot fill out an electronic application due to extenuating circumstances. Additional steps providers may take to accommodate applicants who cannot fill out the application are listed in the "Application methods" section below.
- F. Providers will seek to process all applications within 5 business days.
- G. All applicants will be notified whether they are (i) approved, (ii) denied, or (iii) more information is needed within 10 business days. Notification can happen through a phone call or written notice (email or letter).

Eligibility Criteria and Documentation of Eligibility

To be eligible, a household must meet the following criteria:

- 1.** The household is obligated to pay rent on a residential dwelling; **and**
- 2.** One or more individuals within the household has qualified for unemployment benefits **or** experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the COVID-19 outbreak; **and**
- 3.** One or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability; **and**
- 4.** The household has a household income at or below 80% of area median income

The following factors are NOT required in order to be eligible:

- A. The household does not need to be behind in rent or utility payments or have outstanding arrears payments.
- B. The household does not need to prove that they can maintain their housing costs beyond the months of assistance offered.

- C. The household does not need to have been in their current rental unit when the public health emergency was declared. There is no requirement regarding the length of tenure in the current unit.
- D. The household does not need to apply for rental assistance to apply for and receive utility assistance.
- E. The household does not need to provide evidence of immigration status or provide a Social Security Number. Providers may not ask applicants for evidence of immigration status or for Social Security Cards. While the application asks for a Social Security Number for deduplication purposes, applicants may choose not to provide a Social Security Number for any household member and may not be denied based solely on the fact that they chose not to provide this information.

Eligibility Factor 1: Obligation to Pay Rent

Eligibility Factor:

- A. The household is obligated to pay rent on a residential dwelling.
- B. Households who pay rent on mobile/manufactured homes and/or the parcel of land they occupy meet this eligibility factor.

Documentation:

- A. A current lease, signed by the applicant and the landlord or sublessor, which contains the unit address and rent amount, OR
- B. If a household does not have a written lease, but the applicant is obligated to pay rent on a residential dwelling, applicant may provide other documentation of residence:
 - 1. evidence of a pattern of paying rent for the residential unit (bank statements, check stubs, receipts, etc.), OR
 - 2. an attestation by a landlord who can be identified as the verified owner or management agent of the unit (See: *Landlord Rent Obligation Attestation* in the “Forms and Documentation Guidance” section of this document). If a Landlord Rent Obligation Attestation is used as documentation, the provider must verify that the landlord owns the unit by checking property tax records. Please see the *FERA Provider Instructions* document for instructions on how to check the property tax records.

Eligibility Factor 2: COVID-related Financial Hardship

Eligibility Factor:

One or more individuals within the household has:

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

Documentation:

- A. Emails, letters or other documents, dated after March 13, 2020, confirming approval or receipt of unemployment benefits **OR**
- B. A written attestation signed by the applicant that a household member qualified for unemployment benefits after March 13, 2020 **or** experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the COVID-19 outbreak. (See: *COVID-Related Financial Hardship Attestation* in the “Forms and Documentation Guidance” section of this document)

A household meets this eligibility factor as long as a current household member qualified for unemployment benefits after March 13, 2020. Qualifying for unemployment benefits prior to March 13, 2020 does not disqualify a household from meeting this eligibility factor.

Eligibility Factor 3: Risk of Experiencing Homelessness or Housing Instability

Eligibility Factor:

One or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability, which may include:

- A. a past due utility or rent notice or eviction notice,
- B. unsafe or unhealthy living conditions, or
- C. any other evidence of risk.

Documentation:

- A. A past due utility notice **OR**
- B. A past due rent notice **OR**
- C. An eviction notice **OR**
- D. A written attestation that the household is experiencing unsafe or unhealthy living conditions or is otherwise at risk of experiencing homelessness or housing instability. (See: *Risk of Homelessness or Housing Instability Attestation* in the “Forms and Documentation Guidance” section of this document)

Definitions:

- “Unsafe or unhealthy living conditions”: Subrecipients may determine the presence of unsafe or unhealthy living conditions by accepting written attestation of these conditions. Unsafe or unhealthy living conditions include those which pose a health or safety risk to residents. If the applicant meets this eligibility factor due to unsafe or unhealthy living conditions, assistance may be applied to a new unit but not utilized as forward rent in an existing unit.
- “Risk of Homelessness or Housing Instability”: Subrecipients may accept a self-attestation from the applicant to serve as evidence of risk of homelessness or housing instability. Applicants may qualify as at-risk of homelessness or housing instability if:
 - The applicant is spending more than 30% of their household income on housing costs.

- The applicant is “doubled-up,” defined as one household having one or more adults in addition to the head of household and spouse or partner living together due to a lack of resources. For example, an adult child who has returned to a parent’s household, two related or unrelated families residing together, or a parent living with an adult child.
- The applicant is currently homeless under Categories 1-4 of the federal Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Homeless Definition final rule.

Eligibility Factor 4: Income At or Below 80% AMI

Eligibility Factor:

The household has a household income at or below 80% of area median income.

Documentation:

- A. Depending on applicant eligibility, income documentation may include one or the other of the below:
 - 1. If the client has verifiable income, the *Income Attestation Form Section 1* must be completed **AND** must be accompanied by documentation to support income such as paystubs, W-2s or other wage statements, tax filings, bank statements demonstrating regular income, or an attestation from an employer, **OR**
 - 2. If the applicant has no income, **OR** income is not verifiable due to the impact of COVID-19, **OR** income has been received in cash only, the *Income Attestation Form Section 2* must be completed. (See: *Income Attestation Form* in the “Forms and Documentation Guidance” section of this document)

Income Qualifications:

- A. Income must be based on the household’s monthly income at the time of application, extrapolated over a 12-month period to determine whether household income exceeds 80% of the AMI.
 - 1. Monthly income must be based on source documentation from two months. (If the client has no income, **OR** income is not verifiable due to the impact of COVID-19, **OR** income has been received in cash only, and therefore source documentation is not available, the *Income Attestation Form Section 2* must be completed and two months of source documentation is not required).
 - 2. If applicants return for additional assistance after three months, this income calculation must be done again based on the income of the most recent two months.
- B. Total gross household must be at or below 80% AMI according to the below chart. Providers must use the 24 CFR 5.609 (Part 5) definition of annual income while calculating household income.
 - Resource: Technical Guide for Determining Income and Allowances for the HOME Program <https://files.hudexchange.info/resources/documents/HOMEGuideForIncomeAndAllowances.pdf>

- Resource: HUD Occupancy Handbook Chapter 5: Determining Income & Calculating Rent
https://www.hud.gov/sites/documents/DOC_35649.PDF

FY2020 ANNUAL Income Limits – Effective April 1, 2020								
	Persons in Household							
AMI	1	2	3	4	5	6	7	8
30%*	\$19,150	\$21,850	\$24,600	\$27,300	\$29,500	\$31,700	\$33,900	\$36,050
50%	\$31,850	\$36,400	\$40,950	\$45,500	\$49,150	\$52,800	\$56,450	\$60,100
80%	\$51,000	\$58,250	\$65,550	\$72,800	\$78,650	\$84,450	\$90,300	\$96,100

*30% income limits are used for CDBG reporting purposes only and are from CDBG income limits, effective July 1, 2020

The following chart is intended to help providers determine annual income limits at a quick glance when the client provides income based on monthly amounts. Please note that the program eligibility is based on annual income. Providers must extrapolate **two months** of source documentation over 12 months to determine eligibility based on annual income.

FY2020 MONTHLY Income Limits – Effective April 1, 2020								
	Persons in Household							
AMI	1	2	3	4	5	6	7	8
30%*	\$1,596	\$1,821	\$2,050	\$2,275	\$2,458	\$2,642	\$2,825	\$3,004
50%	\$2,654	\$3,033	\$3,413	\$3,792	\$4,096	\$4,400	\$4,704	\$5,008
80%	\$4,250	\$4,854	\$5,463	\$6,067	\$6,554	\$7,038	\$7,525	\$8,008

*30% income limits are used for CDBG reporting purposes only and are from CDBG income limits, effective July 1, 2020

Prioritization

Providers must prioritize applicants who meet one of the following conditions:

- The income of the household does not exceed 50 percent of the area median income; OR
- One or more individuals within the household are unemployed as of the date of the application for assistance and have not been employed for the 90- day period preceding such date.

For the purposes of implementation, providers may generally process applications as they receive them. In situations in which applications are received at the same time, priority should be given to the applications for which the applicant has checked the box indicating one of the two priority factors listed above. For example, if providers process all applications received throughout the day on the following day, applications for which one of the two priority factors have been checked should be processed first.

Financial Assistance

Providers will serve eligible households with rental or utility arrears and/or assistance according to the following guidance:

Eligible Assistance

- A. Applicants may receive assistance with rental payments, rental arrears, utility payments, utility arrears, and late fees according to the guidance below.
- B. Applicants may receive assistance with security deposits. These are classified as “other” costs.

Arrears

- A. If the household has rental or utility arrears, these must be paid before the household may receive forward rent.
- B. If rental or utility arrears are paid, households may receive up the maximum amount of assistance (12 months) in one payment.
- C. Arrears from prior to March 13, 2020 may not be paid.

Forward Payments

- A. If forward rent is paid, households may receive up to 3 months of assistance in one payment.
- B. As a bill is required for the payment of utilities, forward utilities cannot be paid.

Maximum Assistance

- A. There is no dollar maximum to the amount of assistance that households may receive. The maximum amount of assistance a household may receive is the value of 12 months of rent and eligible utilities.
- B. Households may return to apply for additional months of assistance. Return households do not need to fill out an entire application and should instead submit the *Continued Assistance Application Form*. Households returning for continued assistance must provide income documentation from the most recent two months and income must be verified by the provider. (See: *Continued Assistance Application Form* in the “Forms and Documentation Guidance” section of this document).

Late Fees

Late fees may be included in a rent payment. Providers must notify Lake County each time a late fee is paid that exceeds \$100 by emailing FERA@lakecountyil.gov.

Clients with a Monthly Federal Subsidy (e.g., Housing Choice Voucher)

- A. Applicants who receive a monthly federal subsidy that is adjusted according to changes in income (e.g., a Housing Choice Voucher, Public Housing, or Project-Based Rental Assistance) may receive assistance with the tenant-owed portion of rent and/or utilities that is not subsidized.
- B. Applicants must have already notified their housing provider of their change in income at the time of submitting their FERA application. Applicants who have already had their rent adjusted or who are currently awaiting notification that their rent has been adjusted are eligible for assistance.
- C. Tenants may receive assistance with the tenant-owed portion of rent and utilities only.
- D. All tenants who have a monthly subsidy through a Public Housing Provider (Lake County Housing Authority, Waukegan Housing Authority, or North Chicago Housing Authority) should have their FERA application processed by Lake County Housing Authority if possible.

Clients with a Mobile Home

- A. If a client pays rent on a manufactured or mobile home, then they meet eligibility factor one (so long as they can meet documentation requirements).
- B. Rental payments for the home or the parcel of land it occupies are eligible.
- C. Utility payments are also eligible.

Referrals for other Services and Assistance

Providers may provide eligible households with additional services, such as housing stability case management and housing counseling.

- A. Providers are expected to screen all clients to determine if legal assistance is required to help the household maintain their housing. If determined necessary, Providers are expected to send a referral through the ServicePoint Referral Network to one of the Legal Providers.
- B. Providers are expected to refer clients to additional services (mainstream benefits, health care, mental health care, etc.) if it is determined the client has additional needs. Providers are encouraged to refer clients to additional services through the ServicePoint Referral Network when possible.

Landlord Participation

A successful FERA application requires the participation of both the tenant and the landlord of a unit. Generally, tenants will fill out the application first, which will cause a *Landlord Application Form* to be emailed to a landlord to fill out. If landlords are aware that a tenant is intending to submit an application, they may also submit their *Landlord Application Form* first. If providers receive a landlord form and do not yet have an applicant from a tenant, they must reach out to the tenant to inform them that they have received the landlord form. Providers may wait up to 5 business days to receive the form before attempting to contact the tenant. They must attempt to contact the tenant at least 3 times over 5 business days before the application can be denied due to being “incomplete.” Incomplete applications may be re-opened if additional needed information is submitted.

Landlords may not apply for rent for vacant units and may not apply on behalf of residents that have not paid rent; however, landlords can assist their tenants in successfully completing a FERA application in the following ways:

- Landlords can promote the program to tenants through FERA flyers or by making tenants aware of the FERA program.
- Landlords can ensure their tenant’s application is processed quickly by submitting their landlord form before receiving a notice that their tenant’s application has been submitted.

FORMS AND DOCUMENTATION GUIDANCE

Application Types and Other Forms

There are 4 different application types:

- **FERA Application Form (Public Version):** An initial application, filled out by an applicant. An applicant must sign this application before submitting.
- **FERA Application Form (Provider Version):** An initial application, filled out by a FERA provider that is helping an applicant. This form is not signed when it is initially filled out and is emailed to an applicant for a signature.
- **FERA Continued Assistance Application Form:** A return application, filled out by applicants that previously received assistance and are returning for more.
- **Landlord Application Form:** A form filled out by the landlord that is required of all applications seeking rent assistance.

Other Required Documents

- **FERA Authorization for the Release of Information:** This form authorizes the provider to be able to obtain or share information for the purposes of the program. This enables the provider to contact the landlord on behalf of the client. This form must be signed by all applicants.
- **Authorization to Share Information Using ServicePoint:** This form authorizes the provider to be able to enter client data into ServicePoint. This is a requirement of the program. This form must be signed by all clients. Clients who refuse to sign the [Authorization to Share Information Using ServicePoint](#) cannot be served by FERA. Clients may, however, choose not to share their Social Security Number(s) for any reason.
- **Landlord Rent Obligation Form:** This form is ONLY accepted if the applicant does not have a written lease or other evidence of a pattern of paying rent and is required in this circumstance only. It must be signed and submitted by the property owner that is responsible for paying taxes on the property.
- **COVID-Related Financial Hardship Attestation Form:** This form is only required if applicants are not attaching documentation confirming receipt of unemployment benefits after March 13, 2020. This form must be signed.
- **Risk of Homelessness or Housing Instability Attestation Form:** This form is only required if applicants are not attaching a past due rent or utility notice or eviction notice. This form must be signed.
- **Income Attestation Form:** This form is required of all applicants. Applicants with verifiable income must submit Section 1 and source documentation. Applicants who have no income, or whose income is not verifiable due to the impact of COVID-19, or whose income has been received in cash only, must submit Section 2 and do not need to provide additional source documentation. This form must be signed.
- **FERA Application Signature Card:** This form is only used if the client has extenuating circumstances preventing them from signing their application electronically. A signature is required of every applicant. If a client does not have internet access at home, several FERA providers accept walk-ins or appointments to utilize devices at their offices for filling out and submitting applications. There are also other providers in the community that provide access to the public to utilize computers for internet access, such as libraries. Applicants that are

experiencing extenuating circumstances and are therefore unable to visit a provider and unable to otherwise access a device with internet access may have a provider fill out their application and sign on their behalf, only if the provider has the *FERA Application Signature Card* signed by the applicant. This form must be signed.

Required Documentation Chart

Document	When document is required	
	New Applicants	Return Applicants
FERA Application Form (Public Version or Provider Version)	All	N/A
FERA Continued Assistance Application Form	N/A	All
Landlord Application Form	If the applicant seeks rental assistance.	
FERA Authorization for the Release of Information	All	N/A
Authorization to Share Information Using ServicePoint	All	N/A
Landlord Rent Obligation Form	ONLY if applicant <u>does not have</u> a written lease OR other evidence of a pattern of paying rent	N/A - documentation from application applies
COVID-Related Financial Hardship Attestation Form	Optional: applicants may attach either a) documentation confirming receipt of unemployment benefits after March 13, 2020, OR COVID-Related Financial Hardship Attestation Form	N/A- documentation from application applies
Risk of Homelessness or Housing Instability Attestation Form	Optional: applicants may attach either a) a past due rent or utility notice or eviction notice, OR Risk of Homelessness or Housing Instability Attestation Form	N/A - documentation from application applies
Income Attestation Form Section 1	ONLY If the application has verifiable income (must be accompanied by source documentation).	ONLY If the application has verifiable income (must be accompanied by source documentation). MUST attach NEW documentation.
Source documentation of income	ONLY If the application has verifiable income (must be	ONLY If the application has verifiable income (must be accompanied by Income Attestation Form Section 1).

	accompanied by Income Attestation Form Section 1).	MUST attach NEW documentation.
Income Attestation Form Section 2	ONLY if the applicant has no income, income is not verifiable due to the impact of COVID-19, or income has been received in cash only (Otherwise, applicant must attach Section 1 and source documentation)	ONLY if the applicant has no income, income is not verifiable due to the impact of COVID-19, or income has been received in cash only (Otherwise, applicant must attach Section 1 and source documentation) MUST attach NEW documentation.
Utility Bill	If the applicant seeks utility assistance.	

Original documentation is not required for source documentation. Applicants may submit photocopies, downloaded copies, screenshots, and photos of documents where applicable. For example: If an applicant does not have a paper bank statement and is using the bank statement as evidence of income, the applicant may submit screenshots of statement information from the bank’s online portal or app.

Application Methods

All providers must be able to process applications received via the email inbox. Additionally, providers are encouraged to help applicants fill out applications in other ways:

- A. During an appointment: Providers may make appointments with applicants and fill out the application together, either in person or over the phone.
 1. If the provider fills out the application on behalf of the client, they may not sign the application on behalf of the applicant. The applicant must sign the application.
 2. If the applicant has a device with internet access, the provider can email the completed application to the applicant and all the applicant must do is sign the form electronically. If the applicant does not have a device with internet access, the provider should help them identify where they can go to utilize a device with internet access.
- B. Adjust applications or attachments: Applications should be complete in order to be processed; however, the JotForm application does not require every question be filled out in order to submit the application. This ensures that applicants that struggle with some questions are not discouraged from applying and can still begin the process.
 1. If a provider receives an incomplete application or an application where questions are answered in a manner that is not sufficient to determine eligibility or need, providers must reach out to the applicant to indicate why the application cannot be accepted as-is. Providers should encourage the applicant to fix deficiencies and should work with the applicant to get the application to a place where it can be accepted. Providers must not tell the applicant that due to an incomplete application; the applicant is ineligible and has no opportunity revise their application.
 2. Providers may offer to make changes to the application on behalf of the applicant. This may be especially helpful if the applicant cannot upload backup documentation but can otherwise bring paper copies or send photos of backup documents to providers. To revise an application, providers may use the link emailed to the applicant with their confirmation email. In cases where provider staff are making changes to an application,

providers must get verbal or written approval from the applicant prior to submitting any changes.

- C. Reasonable accommodation: If an applicant does not have a device with internet access at home and has a disability or other circumstances preventing them from being able to leave their home to be able to access a location where they can utilize the internet, the provider may submit an application on behalf of an applicant only if the applicant signs the *FERA Application Signature Card* in the “Forms and Documentation Guidance” section of this document.

Utility Payment Information

- A. Utilities include separately stated utility costs that the applicant is obligated to pay including electricity, gas, water and sewer, and trash removal. Internet service is also an eligible utility; however, for reporting purposes, internet is an “other expense” and is not grouped with other utilities.
 - Internet service provided to a residence is related to housing and is in many cases a vital service that allows renters to engage in distance learning, telework, and telemedicine and obtain government services. Therefore, it is the policy of Lake County that covering the cost of internet is appropriate. If internet services are bundled with other non-eligible services, the provider can only provide assistance with the portion of the bill that is for internet.
- B. The cost of phone services, mobile phone services, or entertainment such as cable bills are not eligible utilities.
- C. Utilities that are covered by the landlord will be treated as rent.
- D. All payments for utilities should be supported by a bill, invoice, or other evidence of requirement of payment to the provider of the utility or home energy service.
- E. Providers do not need to confirm the bill amounts with the utility companies unless the payment amount exceeds \$1,000 per entity.
 - For example: A client has four months of past-due bills for gas, electric, and trash collection. There are four gas bills that total \$400, four electric bills that total \$600, and one sanitation bill that totals \$100. While the total assistance is for \$1,100, each of the payments is less than \$1,000, so there is no need for the provider to confirm the bill amounts with the utility companies.

Confirming Bill Amounts

If the utility payment amount exceeds \$1,000, the provider must confirm the bill amount with the utility company. The provider may confirm by calling the company or viewing the bill through the utility company’s online bill pay portal.

- A. **Phone call:** If the provider chooses to confirm by calling the company, the customer must give permission to the utility company to discuss the details of the customer’s account with a third party (the FERA provider). The customer and provider may call the utility company together, either in the same room or via a three-way call, and the customer can provide permission over the phone. Alternatively, some utility companies permit the customer to give permission ahead

of time by calling the customer service line, in which case the customer does not need to be present when the provider calls the utility company. The provider should place a note in the file about the date the call was placed, and the total assistance amounts confirmed by the utility company.

- B. **Online portal:** If the utility company has an online bill portal, and the portal is able to show both the full outstanding bill balance and the costs incurred each month, the provider may confirm the bill amount by viewing the bill through the utility company's online bill pay portal. The copy should be dated the same date as the day the provider pays the bill. A copy of the information provided by the portal should be printed and placed in the file.

Utility Company Information

- Nicor Gas:
 - Customer Service Number: 888.Nicor4U (642.6748)
 - Hours: Mon-Fri 7:00am-6:00pm
 - Follow the prompt for: Press 3, ask to speak with a representative.
 - Permissions: Clients may call ahead and put a note on their file to authorize Nicor to share information with the Provider.
 - Website: <https://www.nicorgas.com/>

- North Shore Gas:
 - Customer Service Number: 866-556-6004
 - Hours: Mon-Fri 7:00am-7:00pm, Sat 7:00am-3:00pm
 - Best Time to Call: Mon-Fri 7:00am or 6:00-7:00pm
 - Follow the prompt for: "Payment"
 - Permissions: Clients may call ahead and put a note on their file to authorize North Shore Gas to share information with the provider. The client must have a specific name, such as a case manager, and the name must be put into the note as a "Related Customer" in order for the case manager to conduct business on the client's behalf.
 - Website: <https://accel.northshoregasdelivery.com/>

- ComEd:
 - Customer Service Number: 1-800-334-7661
 - Hours: Mon-Fri 7:00am-7:00pm
 - Follow the prompt for: Any customer service representative.
 - Permissions: Clients may call ahead and put a note on their file to authorize ComEd to share information with the provider.
 - Website: <https://www.comed.com/Pages/default.aspx>

Reporting Requirements

Monthly Reporting

Monthly Reports are due each month on the 7th day of the next calendar month. For example, if the report is for the calendar month of April, it is due on May 7th. The monthly report includes:

- Check register: the check register should be a printout from the financial tracking system your provider utilizes. It should include all checks paid on behalf of the FERA program during that calendar month.
- Monthly summary: The monthly summary is an excel document that the provider fills in. The document contains three tabs:
 1. Clients: The Clients tab includes all client applications that were paid during that calendar month. Applications that have been received but not yet approved for payment do not need to be on the summary.
 2. Applications: the Applications tab includes the total number of applications received, approved, and denied (determined ineligible or unable to fund). There are separate columns for new applicants and returning applicants.
 3. Project Delivery: the Project Delivery tab includes the total amount of funding used, and the percentage used for administrative costs and housing stability services costs.

Monthly reports are cumulative. Information from prior months of the report should not be removed when new information is added to the excel document.

Provider Contract Information

Project Delivery/Administration Fees

Providers can choose from two methods to obtain payment for its project delivery costs:

- Option A) Project Delivery is 10% of total funds spent. No backup documentation is required. The 10% Project Delivery amount is automatically added to Direct Assistance amounts in calculations of agency spenddown. Funds may be used for any costs necessary to deliver the program.
- Option B) Project Delivery is not limited to a percentage of contract. Full back up documentation of time and effort is required (time sheets, payroll information, invoices/receipts). Project Delivery amounts must be submitted in a voucher. Funds may be used for only eligible costs, including staff time, supplies, and occupancy. Costs shared across multiple programs, such as supplies and occupancy, are only eligible if there is an approved documented allocation method. Please note that Option B is subject to availability of funds. Project Delivery funding is not guaranteed beyond 10% of the contract total.

Contract Payment

Contracts will be paid based on milestones:

- 50% of the contract will be paid upon execution of the contract.

- 40% of the contract will be paid if the provider has satisfactorily met a series of performance metrics including spending levels, documentation, reporting and resolving application errors.
- 10% of the contract will be held back until the project close-out. Closeout may take up to 60 days, therefore final payment will be several weeks after the program ends. Providers must submit all outstanding documentation in order to receive final payment.

Please note that if payments are delayed due to a provider's inability to meet performance metrics, payments will not be issued until all outstanding program or documentation issues have been resolved. Payments may be issued up to 4-6 weeks after the successful resolution of all issues. Providers **may not** request that payments be rushed.

FERA Provider Conflict of Interest Policy

Eligible applicants that reside in units owned or managed by a FERA provider may receive assistance with their rent. Applicants in this situation must apply through a FERA provider other than their landlord/property manager. FERA providers who receive applications from tenants who reside in units the provider owns or manages must ask the applicant to resubmit the application to another provider. Applicants who reside in public housing or have a Housing Choice Voucher may have their applications processed by the Lake County Housing Authority.

Eligible applicants that work for a FERA provider or are closely related to someone who works for a FERA provider may receive assistance. Applicants in this situation must apply through a different FERA provider. FERA providers who receive applications from staff members or close relatives of staff members must ask the applicant to resubmit the application to another provider.

Applicants may resubmit their application by utilizing the link sent to their email upon submission of the online application form and selecting another provider.

POLICIES AND PROCEDURES

Introduction

These policies and procedures address the requirements of the *U.S. Department of the Treasury Emergency Rental Assistance Frequently Asked Questions* document revised March 26, 2021. This section may be amended to accommodate additional revisions to the document. While this document is intended to ensure program compliance and consistency across partners, Lake County recognizes that this document may not anticipate the individual circumstances of each applicant. Therefore, Lake County reserves the right to exercise discretion on a case by case basis within the U.S. Treasury rules.

Prioritization

Lake County will determine prioritization according to the following procedure:

Providers must prioritize applicants who meet one of the following conditions:

1. The income of the household does not exceed 50 percent of the area median income; OR
2. One or more individuals within the household are unemployed as of the date of the application for assistance and have not been employed for the 90- day period preceding such date.

For the purposes of implementation, providers may generally process applications as they receive them. In situations in which applications are received at the same time, priority should be given to the applications for which the applicant has checked the box indicating one of the two priority factors listed above. For example, if providers process all applications received throughout the day on the following day, applications for which one of the two priority factors have been checked should be processed first.

Records will be maintained to ensure compliance including applications and summary reports from providers. Lake County will monitor applications that are submitted by providers to ensure that they are following prioritization protocol. Lake County will also monitor applications to check for fraud.

Written Attestation

Lake County will accept written attestation from applicants without further documentation to determine any aspect of eligibility according to the following guidelines:

- **Obligation to pay rent:** Lake County will not accept written attestation from the applicant without further documentation. Written attestation from the landlord may be accepted if no lease can be provided.
- **COVID-related financial hardship:** Lake County will accept a written attestation signed by the applicant that a household member qualified for unemployment benefits after March 13, 2020 or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship due, directly or indirectly, to the COVID-19 outbreak.
- **Risk of experiencing homelessness or housing instability:** Lake County will accept a written attestation that the household is experiencing unsafe or unhealthy living conditions or is otherwise at risk of experiencing homelessness or housing instability.
- **Income:** Lake County will accept a written attestation of income if the applicant has no income, OR income is not verifiable due to the impact of COVID-19 (for example, because a place of employment has closed), OR income has been received in cash only. Applicants may utilize the

written attestation to accommodate disabilities, extenuating circumstances related to the pandemic, or a lack of technological access.

- **Amount of assistance:** Lake County will not accept written attestation from the applicant without further documentation. Written attestation from the landlord may be accepted.

Lake County has reasonable validation or fraud-prevention measures in place to prevent abuse:

- Landlords are required to confirm amounts owed by the household.
- Providers must check a database to ensure that applicants are not receiving assistance from other providers prior to providing assistance.

Risk of Experiencing Homelessness or Housing Instability

The Act requires that one or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability, which may include (i) a past due utility or rent notice or eviction notice, (ii) unsafe or unhealthy living conditions, or (iii) any other evidence of risk, as determined by the grantee.

Lake County will determine the presence of unsafe or unhealthy living conditions based on applicant's self-attestation. The self-attestation will serve as evidence of risk that a household satisfies this requirement.

Income Definition and Determination

Lake County will use HUD's definition of "annual income" in 24 CFR 5.6091 to determine income of applicants.

Income eligibility must be based on sufficient confirmation of the household's monthly income at the time of application, extrapolated over 12 months. Household income must be recertified every three months.

Identification of the Unit and Rental Payment Amount

Lake County will require applicants to submit a current lease, if available, 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. Other reasonable documentation may include: evidence of a pattern of paying rent or utilities such as bank statements, check stubs, or receipts.

Other Expenses Related to Housing

The Act requires that other expenses must be related to housing and be incurred due directly or indirectly due to COVID-19. Internet service provided to a residence is related to housing and is in many cases a vital service that allows renters to engage in distance learning, telework, and telemedicine and obtain government services. Therefore, it is the policy of Lake County that covering the cost of internet for any eligible applicant is appropriate.