



Pinellas CARES
Financial Assistance

April 24, 2020

I. POLICY:

The Pinellas County Board of County Commissioners has directed, through its Humans Services Department, to provide Emergency Financial Assistance for low income residents that are suffering from financial hardship due to a qualifying emergency event and are unable to pay for past due rent, utilities, and other critical needs.

In March 2020, the United States began to see an increase in the incidence of the coronavirus disease 2019 (COVID-19), as it continued to spread globally. As such, a national state of emergency was declared, and Pinellas County followed with a declaration of local state of emergency on March 13, 2020. With potential impacts of the pandemic greatly exceeding local response resources, these community costs were not accounted for in the approved budget. In response to the economic impact of “social distancing” and “safer at home” measures implemented by federal, state, and local governments, Congress enacted the “Coronavirus Aid, Relief, and Economic Security Act”, also known as the “CARES Act.”

The CARES Act provides financial support to citizens, businesses, and local governments to lessen the economic impacts of the state of emergency. On April 16, 2020, the Pinellas County Board of County Commissioners (Board) passed a resolution to design an expanded assistance program for individuals and families that were directly impacted by loss of income due to the COVID-19 health emergency. This program, “***Pinellas CARES Financial Assistance***”, leverages established infrastructure to efficiently and effectively distribute financial assistance, in accordance with the CARES Act and the procedures contained herein to eligible adults. This program is offered on a first come, first served basis as funding is made available. This program is not a business assistance program and does not cover items otherwise covered by insurance or reimbursed under other federal programs.

II. REQUIREMENTS:

A. Administration

The Board, through its Human Services Department, contracts with 211 Tampa Bay Cares, Inc. (211) for the administration of financial assistance. This administration will work with the County on the Pinellas CARES Financial Assistance program for COVID-19 impacts. 211 is responsible for screening and intake, eligibility assessment, payment issuance, and data collection, as detailed herein.

B. Applicant Eligibility

Eligibility is limited to low-income Pinellas County residents, both individuals and/or families with at least one applicant who is aged 18 and older or a legally emancipated youth. Applicants must provide documentation of citizenship, residency, identification, income, assets and need.

For legally married couples and families who seek assistance, and/or for roommates who share responsibility in a lease, documentation must be provided regarding each adult individual's identification, income, assets, and need.

1. Proof of Citizenship: Applicants must be a U.S. citizen by birth, a naturalized citizen, a legal permanent resident immigrant, or a refugee or asylum seeker. Illegal aliens or persons in the U.S. under any sort of temporary status, such as a student or tourist visa, do not meet citizenship requirements. The following documents are acceptable proof of citizenship:
 - a. A social security card may demonstrate citizenship if it meets the criteria outlined in the attached "USCIS" Cards and Codes reference document.
 - b. Citizens by birth may provide a birth certificate to demonstrate citizenship if born in any state in the U.S., Puerto Rico, U.S. Virgin Islands, Northern Mariana Islands, American Samoa, Swain's Island, Guam, or born abroad to parents who are U.S. citizens.
 - c. Citizens who claim to be naturalized must provide documentation in the form of a Certificate of Naturalization or a valid U.S. passport. A naturalized citizen is defined as a person born in another country but who has since obtained U.S. citizenship.
 - d. Legal Permanent Resident Aliens must provide documentation which may include a "green card," INS forms I-151 or I-551. A visa or other official United States document stamped: "Processed for I-551; temporary evidence of lawful admission for permanent residence; valid until mm-dd-yy; employment authorized," is acceptable as proof.
 - e. Refugee or Asylum Seekers, defined as those from Albania, Vietnam, Bosnia, Cuba, Haiti or other countries who legally reside in the U.S. as political refugees or asylum seekers must provide INS form I-94 stamped to identify the applicant as a refugee or asylum seeker.

2. Identification: Applicants must provide two forms of identification. Proof of citizenship from Section (1) above may count as one form. An acceptable second form of identification may be:
 - a. Social Security Card
 - b. Pinellas County Driver's License or State Identification
 - c. Birth Certificate
 - d. Marriage License
 - e. Voter Identification Card
 - f. Veterans Administration Identification
 - g. School Records
 - h. Food Stamp card
 - i. Police Identification card
 - j. Immigration Records
 - k. DD 214

Note: Documentation from a foreign country may be accepted as a second form of identification provided that documentation of refugee, asylum seeker, or legal permanent resident alien is also included.

3. Proof of Pinellas County Residency: Assistance may only be provided to applicants who are current residents of Pinellas County. Applicants must provide two of the following:
 - a. Copy of current Florida Driver's License or Florida Identification card showing a Pinellas County address
 - b. Mortgage documents, Rental lease, rent receipts or letter from a landlord or property owner
 - c. Proof of Homestead Exemption
 - d. Recent water, electric, gas, telephone, cable television or other utility bill in the name of the applicant indicating a current address within Pinellas County
 - e. Vehicle registration in the name of the applicant indicating an address within Pinellas County
 - f. Pinellas County Voter Identification card
 - g. Recent historical record of residence documented by another social service agency within Pinellas County. Includes Mobile Medical Unit.
 - h. Cancelled mail from a Federal, State, County, or City agency addressed to the applicant at a Pinellas County address
 - i. Declaration of Domicile recorded with the Pinellas County Clerk of the Circuit Court
 - j. Current professional license indicating a home address in Pinellas County
 - k. Record of criminal activity indicating a Pinellas County address when arrested
 - l. Employment record indicating a home address in Pinellas County
 - m. Bank, credit union, or similar documents indicating a home address in Pinellas County
 - n. Letter from Pinellas County Shelter Provider stating Pinellas County residency

4. Income: Applicants must demonstrate that they had income, but it was reduced or eliminated as a direct result of COVID-19 impacts. Income must be at or below 200% of the 2020 Federal Poverty Guidelines at the time of application.
 - a. Income consists of wages, self-employment, contributions, and benefits (including SNAP), either earned or non-earned, from legal sources.
 - b. All reported income and non-cash benefits must be documented with the most recently available 60 days of pay, check stubs, or bank statements, employer letter, or benefits letter. Unless by exception, documentation must have been generated within 30 days prior to the submitted request.
 - c. If self-employed, bank statements or self-employment records must be documented for the last three (3) months.
 - d. If back-child support is a source of income, documentation must be provided that the child is over 18 years of age or no longer living in the home.
 - e. In instances where recent overtime or supplemental income may cause an applicant to be over the income limits based upon the last 30 days, but the supplemental income is not regular or dependable, income should be calculated from the year-to-date total on a paystub, divided by the number of months covered.

Federal Poverty Level Income (FPL) Guidelines for 2020:				
Persons in Household	Gross Monthly Household Income at 100% of FPL	Gross Annual Household Income at 100% of FPL	Gross Monthly Household Income at 200% of FPL	Gross Annual Household Income at 200% of FPL
1	\$1,063	\$12,760	\$2,127	\$25,520
2	\$1,437	\$17,240	\$2,873	\$34,480
3	\$1,810	\$21,720	\$3,620	\$43,440
4	\$2,183	\$26,200	\$4,367	\$52,400
5	\$2,557	\$30,680	\$5,113	\$61,360
6	\$2,930	\$33,160	\$5,860	\$70,320
7	\$3,303	\$39,640	\$6,607	\$79,280
8	\$3,677	\$44,120	\$7,353	\$88,240
Each additional person add:	\$374	\$4,480	\$746	\$8,960

5. Proof of Assets: For financial assistance requests, applicants must not have available liquid assets above \$4,000.00. Liquid assets include the applicant's savings and checking accounts, and an entire bank statement showing the past 60 days deposits, withdrawals, and charges (or statement received within the last 60 days) for each account shall be submitted for verification. A statement from an EPPI or SSI card may be used to verify assets if no bank account is held. Assessment of liquid assets will be included in the screening by 211 staff.
6. Documentation of Qualifying Emergency Event- COVID-19: Applicants must demonstrate that their current emergency situation is a result of the impact of COVID-19, and may include:
 - a. Layoff or furlough notice
 - b. Proof of reduction in hours
 - c. Loss of job due to COVID-19
 - d. Demonstration/notice of reduction in force by business
 - e. Demonstration that employer office/place of business has closed
7. Documentation of Assistance:
 - a. Frequency and Amount of Assistance:
 - i. Individuals may not receive emergency financial assistance more than one time under the Pinellas CARES Financial Assistance program.
 - ii. The maximum amount of assistance available to an individual or family is \$4,000.00.

- iii. Applicants may request assistance of more than one type. Requests for multiple types of assistance should be bundled when appropriate, considering the immediate health and safety needs of the applicant.
- b. Basic Types of Assistance
- i. Payment of overdue rent or mortgage to avoid eviction or foreclosure.
 - *Required documentation for rent: Eviction notice or late notice listing the amount past due and a copy of lease. If landlord is an individual and not a management or leasing company, effort must be made to verify property ownership in the Pinellas County Property Appraiser database at www.pcpao.org. The search may be done by owner name or property address. A W-9 must be provided. If the applicant receives Section 8 Tenant- Based Assistance, a Housing Assistance Payment Contract (HAP Contract) is required in addition to the lease agreement.*
 - *Required documentation where a relationship exists between landlord and tenant, or where landlord and tenant share a unit: documentation of past rents paid (bank statements, cancelled checks) and/or documentation that the landlord holds the property to be a rental unit and pays taxes (tax return, documentation of rental income).*
 - ii. Payment of overdue utility bills (water, sewer, electricity, and/or gas) to prevent shutoff resulting in unhealthy living conditions and/or to prevent eviction, or payment of overdue telephone and/or internet service needed for employment in a “work from home” setting.
 - *Required documentation: copy of utility shut-off notice or late/overdue bills; documentation of remote employment situation.*
- c. Ineligible Items
- i. Legal fees or any expenses related to criminal activity including court costs, citations, restitution, child support, or alimony
 - ii. Telephone and Internet not required for maintaining verified employment, or education
 - iii. Moving Expenses
 - iv. Alcohol, tobacco, firearms or lottery tickets
 - v. Expenses related to immigration or returning to country of origin
 - vi. Gift Cards
 - vii. Insurance premiums
 - viii. Money orders
 - ix. Any transaction at a financial institution using a purchasing card (i.e., ATM)
 - x. Property taxes
 - xi. Payment to a landlord or utility company for the same residence, same expense, and same time period, by a different, otherwise eligible, applicant such as a roommate
 - xii. Specific to CARES Act guidance
 - Expenses for State share of Medicaid
 - Damages covered by insurance
 - Expenses that have been or will be reimbursed under any federal program.

III. PROCEDURES

Staff will answer calls for this program Monday through Friday from 7:30am to 6:00pm. If a holiday falls on a weekday, the program will operate the same hours.

211 will maintain screening and eligibility information within their call center database for review and audit by the County. 211 will maintain a full, separate accounting of all dispersed funds associated with each instance of assistance. All dispersed funds will be reconciled to 211 bank statements on a monthly basis or more frequently as required by the County.

- A. Initial Screening: When an individual contacts 211 for Pinellas CARES Financial Assistance, 211 call center specialists will conduct a brief interview and/or coordinate screening information and documentation by text to assess the client's needs. (Note: 211 staff and volunteers are trained on the Agency's conflict of interest policy which prohibits staff from assisting family or friends.) The information provided by an applicant may be evaluated for accuracy. Any false information provided or multiple inconsistencies in documentation may be grounds for denial or ineligibility for future assistance.
 - 1. 211 staff will obtain demographic information, documentation required to determine eligibility, details on the emergency need, amount of request, vendor details, payment method, and other information and enter this information into the call center database.
 - 2. 211 staff will coordinate appropriate referrals to additional community programs and services during initial screening.

- B. Eligibility Verification: 211 staff is responsible for ensuring all documentation necessary for verification, processing, and approval of request is collected. Failure of an applicant to provide any information or additional contact within seven (7) days of the initial request may result in closure of the pending case. Cases with continued contact and document submission by an applicant will remain in pending status if funding remains available. Please note that this program has a limited amount of funding available and no further applications may be completed or processed once funds are exhausted.
 - 1. 211 staff is responsible for obtaining and scanning all documentation into their database to verify citizenship, residency, income, identification, qualifying emergency event, and need prior to submitting any request for payment for eligible items.
 - 2. All approvals and denials are recorded in database.

- C. Approval Process: All requests for approval are handled once all required documentation is received and eligibility is confirmed.
 - 1. Level 1 Approval: Requests for assistance from \$0.01 to \$299.99 are entered into the database by call center specialists and paid online or by check.
 - 2. Level 2 Approval: Requests for assistance from \$300.00 to \$2999.99 are reviewed by the 211 program supervisor or a designated 211 manager for approval or denial.
 - 3. Level 3 Approval: Requests for assistance \$3,000.00 and above are transmitted electronically to the 211 Executive Director and Pinellas County Human Services Director or designee for joint approval when all other eligibility documentation has been submitted.
 - a. When necessary, urgent items should be paid immediately upon receiving sufficient documentation (immediate health/safety needs, utility shut-offs, evictions) while items which may take longer to complete may be submitted separately.

- b. The Level 3 approval process would continue to apply to items and bundles \$3,000.00 and above.
- 4. If a request is DENIED, 211 staff will contact the applicant directly within 2 business days and notify them of the reason for denial and provide other referrals or resources, as available.

D. Payment Process:

- 1. Online payments of approved items are made directly to the vendor using purchasing cards issued in the 211 call center specialists' name. If the vendor cannot be paid or the item cannot be purchased online, a check request is submitted for payment directly to the vendor. 211 processes check requests two times weekly. In rare instances, a restricted debit card may be provided directly to the client for the approved amount. All cards are time limited and must be returned to 211 with receipts within seven days.
- 2. 211 staff is responsible for tracking and reporting call center data, client demographic, eligibility and expenditure data, performance measures and outcomes. Most of this information will be reported from their database. Human Services will have direct access to the 211 database for ad-hoc reports as needed.
- 3. 211 will request reimbursement from the County on a monthly basis for staff and operational expenses.
 - a. This invoice will be submitted concurrently with invoices from any other operations contracts between 211 and the County by the fifteenth (15th) of the month for the prior month's expenses.
 - b. All requests for reimbursement will consist of a cover letter signed by an authorized Agency representative and will include supporting documentation including invoices, receipts, pay stubs, training logs and any other documentation to verify the expenditures.
 - c. Invoices are reviewed and reconciled by Human Services prior to approval for payment.
- 4. A portion of the funding for the Pinellas CARES Financial Assistance pool will be advanced to 211 and will be held in a separate bank account.
 - a. A separate invoice will be submitted for the assistance pool, and will consist of a cover letter signed by an authorized Agency representative, supporting documentation with detailed client specific data and receipts to justify eligibility and expenditures and any repeat requests, a copy of the monthly bank account statement for the bank account in which the pool is held, and a report of the director-approved exception expenditures for the month. Backup documentation may be submitted electronically in a secure manner.
 - b. Specifically for rent requests: in addition to the proof of emergency need and copy of a lease, 211 will also submit a copy of the vendor's W-9 form and the cancelled check signed by the vendor with the monthly invoice for reconciliation.
 - i. The name on the W-9 MUST match the name on the cancelled check.
 - ii. For any Director-approved payments, an email of each Director's approval shall be attached to the client backup documentation.
 - c. Any supporting documentation submitted by a client MUST have the client's name visible and legible on the document.
- 5. Upon reconciliation and approval of the monthly or semi-monthly invoice for the Pinellas CARES Financial Assistance pool, the County will reimburse 211 for

expenditures until the entire assistance pool contracted amount is reached. 211 will then continue to submit separate monthly invoices but will draw down against the assistance pool until it is extinguished, or the term of the contract is reached. In the event that funds remain in the Pinellas CARES Financial Assistance pool at the end of the program or contract term, the remainder shall be remitted to the County with thirty (30) days of final reconciliation.

- E. Use of Encryption: Emails containing personal identifiable information (PII), personal health information (PHI), or other sensitive information about a client or caller should be encrypted prior to be sent to any and all receivers. Emails should be encrypted to the recipient when the following items are included:
1. Personal identifiable information: client names, social security numbers or cards, dates of birth, gender, and/or zip codes
 2. Personal Health Information: medication, diagnostic, treatment, or disease identification. Sensitive Information: case or call details, names of minors, income information, leases, utility bills, bank statements, addresses, phone numbers, or email addresses.
- F. Appeals, Quality Assurance, Fraud, and Other Concerns:
1. Program Criteria: Appeals or concerns with program criteria shall be addressed to the County. Upon receipt of a concern, 211 shall issue a letter to the applicant directing them to contact the Pinellas County Human Services Financial Assistance Contract Manager.
 2. Fraudulent Concerns:
 - a. Human Services Review: Human Services will perform quality assurance on a random sampling of participants as indicated in Section F (2) above. If any participants are found to have committed fraud in obtaining financial assistance from the County, the County will notify 211.
 - b. 211 Review: If, in the exercise of their contractual responsibilities, 211 becomes aware of a fraudulent case, 211 shall notify the County as soon as possible.
 - c. Upon discovery of a fraudulent case, the participant may be prohibited from further assistance through Human Services. 211 shall notify the participant in writing of the finding, request reimbursement of any funds received in a fraudulent manner and notify the participant of their future ineligibility.
 - d. Following notification to the client by 211, Pinellas County may provide written notification to the participant of the findings and their subsequent ineligibility for all Human Services programs.
 - e. Fraud Rebuttal: Appeals or concerns with a disqualification due to a finding of fraud shall be addressed to the County. Upon receipt of a concern, 211 shall issue a letter to the applicant directing them to contact the Pinellas County Human Services Financial Assistance Contract Manager. Eligibility Determination: Appeals or concerns regarding the eligibility determination of an applicant shall be submitted to the Exceptions Committee and are subject to Directors' review. All decisions of the Exceptions Committee are final.
 3. Stop Check Fee: If a check has not been cashed for a period exceeding 90 days, 211 shall make attempts to contact the payee, and may issue a stop-check order through the bank at a fee of \$17 per check to be reimbursed through the program.

G. Conflict of Interest:

1. Any individual homeowner, property manager, or landlord, who is also employed by or affiliated with Pinellas County Human Services or a Human Services contracted Provider Organization which works with vulnerable populations through a program designed to assist such populations, is prohibited from receiving payment directly or indirectly from the sale or rental of real property, personal property, or personal services, from participants in the subject program. This does not include registered non-profit organizations that serve as owners, property managers, or landlords for low-income or homeless housing.
2. This section does not preclude an employee or affiliated individual who is otherwise eligible as a client for this program from receiving assistance, in accordance with all other policies, procedures and section 112.313(6) Florida Statutes.

IV. Reporting

A. Performance Measures

1. Total number/ % of emergency financial assistance calls and texts received
2. Number / % dropped or abandoned calls
3. Average talk time
4. Average call wait time
5. Average number of calls by day and time and by call center specialist
6. Time to process request (enter into system, receive approval)
7. Number and percentage of:
 - a. Reasons for financial emergency (COVID-19 impacts)
 - b. All callers answered by 211 and by volunteer or assistance staffing
 - c. All callers assessed for emergency financial assistance by 211 and by volunteer or assistance staffing (approved and denied)
 - d. Clients served by type and amount of assistance
 - e. Program met and unmet needs of callers
 - f. Unique callers by need

B. Immediate Outcome Examples: [Measured by actual requests approved and successful payment of assistance to vendors]

1. Number of individuals and families that bridged utilities expenses due to Pinellas CARES Financial Assistance
2. Number of individuals and families that bridged housing payments due to Pinellas CARES Financial Assistance
3. Number of individuals and families that received assistance for other critical needs by type.
4. Number of individuals and families referred and linked to other supportive community resources
5. Number of pending individual and family assistance cases
6. Number of individuals and families that were not determined eligible by reason
7. *Additional TBD*

C. Operational Tracking Reports:

1. Daily assistance cases paid and pending cases report
2. Daily 'encumbered' Pinellas CARES Financial Assistance pool amount

3. Daily Pinellas CARES Financial Assistance pool balance report (paid out versus remaining balance)
4. Daily and/or biweekly advance pool bank statement
5. Direct client services expenditure report with itemized purchases and remaining available balance
6. Invoices accompanied by detailed documentation of direct client expenditures
7. Report of Director approved exception expenditures
8. Reports of program performance measures