

CHARLOTTE COUNTY
HUMAN SERVICES DEPARTMENT
STANDARD OPERATING POLICY AND PROCEDURES

Subject: Seawall Repair Assistance Program	Effective Date: March 1, 2024	Number: N/A
Division: Neighborhood Services	Last Amended:	Page: 1 of 4
Signed:	Title: Director	Date:

I. PROGRAM OBJECTIVES

Funding provides grant assistance to Charlotte County homeowners impacted by Hurricane Ian and Nicole with necessary seawall repairs that were not covered by insurance or any other state or federal recovery program. This is a matching grant issued to eligible homeowners.

II. ELIGIBLE HOUSEHOLDS

Households receiving assistance are those on a fixed income with gross monthly income at or below 120% AMI who reside in an eligible housing unit (assessed value per U.S. Treasury calculation) in need of necessary seawall repairs to protect their property. Demonstration of cost burden is required to qualify for assistance (see Cost Burden Analysis policy below).

All households receiving this assistance must be homesteaded, year-round residents (no seasonal occupancy). While the maximum award is \$150,000.00, homeowners are required to provide an up to 10% match, adjusted for income level. All payments shall be paid directly to the vendor after homeowner obligation is met. For eligible applicants having completed seawall repairs or replacement prior to case decision date with proof of payment for services to a qualified vendor may be eligible for reimbursement, less required match amount.

III. GENERAL POLICIES

- Applicants can apply on-line through the Long-Term Recovery Group's application portal: www.coadfl.org. Applicants lacking access to a computer may use the computers available in the lobby at the Family Services Center, 21500 Gibraltar Dr., during regular business hours. Those needing help with technology can call the Gulf Coast Partnership or Human Services during regular business hours for assistance.
- Agency staff will inform applicants of required documentation not submitted with on-line application prior to being assigned for case management.
- Approved applicants are responsible for obtaining estimates, unless they request assistance from the case manager in writing. Selection of vendor is the homeowner's responsibility and the contract is between the homeowner and the vendor.
- Vendor must be licensed and insured and registered with Charlotte County to provide the service.
- Any applicant denied benefits under the Seawall Repair Assistance program will be provided with the Applicant Appeal & Grievance Policy and will be granted the right to appeal the decision according to the terms of the policy.
- All applicants are treated equitably regardless of race, color, national origin, gender, disability, age, religion, political belief or their housing status.

- All information gathered to determine a client's eligibility is confidential information and all precautions shall be taken to protect this information.
- Human Services employees will not provide intake, assessment, eligibility determination or provide case management services for themselves, their family, friends or domestic partners. Applications where this conflict of interest exists will be referred to a manager for reassignment. Employee records are maintained separately from client records.

IV. INCOME VERIFICATION AND DOCUMENTATION

Proof of gross income and assets for all adults in the home is required. Applicants must submit wage stubs, benefit letters, bank statements, investment portfolio statements, etc. for the six (6) prior months. In the event of self-employment, self-declaration plus a profit and loss statement for the prior 12-month period must be provided. Applicants must demonstrate the cost burden of making the seawall repairs or replacement (see below).

Other required documentation includes, but may not be limited to:

- Insurance policy, claim letter, and settlement letter, if applicable
- FEMA registration number, claim letter, and settlement letter, if applicable
- Duplication of Benefits form
- Verification that seawall damage was hurricane-related
- 1-2 estimates for seawall repair/replacement

All identification, household composition and income verification documents must be completed based on the initial application from the client. If the client reports income, verification(s) of this income should be sent out within one week using the relevant forms as provided by staff. This information will be used to complete eligibility determination. This form and all supporting documents should be included in the client's file.

Cost Burden Analysis

It is universally accepted that combined housing costs exceeding 30% of gross household income from all sources is a cost burden. When a household is presented with an unmet housing need (rent/mortgage arrears, emergency repairs, etc.) and applies for assistance due to their inability to pay, considering cost burden is an important factor in establishing whether assistance is awarded to an otherwise eligible household. Households with available cash and assets sufficient to meet housing costs without undue cost burden are not in financial crisis and, therefore, not eligible for assistance. The following formula is applied when calculating cost burden:

Gross annual household income + 30%

Example: HH of 4 at 80% AMI with max annual income of \$61,350 could have a total of \$79,755 in available cash/assets such as investments, CDs, IRAs, 401Ks, etc. Trusts, land, primary home, vehicles are not assets for the purpose of calculating the cash/asset limit, but income from such assets (interest, dividends, rental income, etc.) is calculated in gross HH income.

V. BENEFIT LEVEL DETERMINATION

Benefit levels vary based on damage assessment and contractor estimates. Benefit level is limited to the actual cost of repairs less homeowner match. Match amount is determined by income level as follows:

- 81% - 120% AMI 10% match
- 51% - 80% AMI 5% match
- < 50% AMI no match required

Homeowner match must be paid to vendor before funds will be disbursed. A final invoice reflecting homeowner balance after match is required to process payments. Total benefit not to exceed \$150,000.

IV. CLIENT RECORDS

- Proof of identification for all household members (birth certificates for those under age 18).
- Social Security Cards for all household members.
- Copies of
 - Six most recent consecutive pay stubs
 - Most recent benefit letter(s) reflecting gross income (SSI, SSDI, VA disability, TANF, etc.)
 - Six most recent bank statements, investment portfolio statements, retirement statements, etc. (in order to calculate all income from assets)
- Copy of court-ordered child support (if applicable).
- Verification of food stamp benefits eligibility (Listing all HH members), if applicable.
- Acknowledgement of:
 - Notice Regarding Collection of Social Security Numbers. Clients' social security numbers will be handled in a manner that will always protect their identity. Paper copies in the files will always be locked away securely and the electronic storage can only be accessed by a staff member with username and password.
 - Authorization for Release of Information
 - Fraud Policy
- Verification that repairs were not covered by insurance or any other state or federal recovery program (eg: insurance settlement letter, FEMA settlement letter, etc.)
- Estimate(s) for seawall repair/replacement.
- Approval letter with schedule of assistance (if applicable).
- Denial letter with appeals process (if applicable).
- For vendor payment and/or applicant reimbursement:
 - Contractor invoice reflecting balance due after homeowner payment and W-9; or
 - Contractor invoice reflecting amount paid by homeowner for eligible repairs and homeowner proof of payment.
 - Certification by a licensed engineer using AIA forms G702 and G703, or their substantive equivalents, certifying that the project, or a quantifiable portion of the project, is complete.
 - Before and after photographs of the completed work.

V. FRAUD

Fraud occurs when an applicant knowingly and willingly provides false information about their circumstances to receive assistance. Fraud also occurs when an applicant intentionally fails to report changes in household circumstances in a timely manner that may impact their continued involvement in case management programs.

- Some examples of fraud include not declaring all income, misrepresenting household members present in home, and couples pretending to be tenant and landlord to create a fictitious tenancy.
- Staff will use due diligence during the application process to prevent the disbursement of funds to ineligible applicants. Staff should refer suspected fraud instances to management before benefits are received.
- Fraud can be detected on open or closed cases and in one or more program(s).
- If it is determined that an applicant provided false information prior to receiving a benefit, the application is denied, and the applicant is notified in writing. An applicant who commits fraud is ineligible to apply for Human Services financial assistance for a minimum period of 2 years after the fraud is discovered. The restriction applies to anyone living in the household at the time that the fraud was committed.

- If the fraud is discovered after payment was made, the case will enter a repay phase. The benefit is considered an overpayment. Human Services will attempt to recapture the funds, and the client is given an opportunity to repay the funds in question.
- If the applicant does not respond or is not cooperative, Human Services may contact local law enforcement and cooperate with investigation officials.
- A written fraud policy will be signed by the client and maintained in the client file.

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