

Emergency Rental Assistance Program: Executive Summary

Ensuring Program Compliance
with the Eligibility Criteria

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Report by the Office of County Internal Audit

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Ensuring grant participant eligibility has added challenges when monitoring subrecipient service delivery

Clackamas County has various systems and tools in place to comply with the Emergency Rental Assistance Program's eligibility criteria when participants apply directly with the county. Different systems and tools are used when participants apply through county subrecipients. While the county's subrecipient agreements require the grant subrecipients check and comply with federal requirements, it is the county's responsibility to establish a monitoring program to ensure all grant subrecipients are complying with all grant criteria.

Each subrecipient has developed their own systems and processes to administer and monitor the program. Not all structures and procedures effectively tracked the number of months paid to each household. Subrecipient noncompliance with the 18-month maximum criteria of the Emergency Rental Assistance Program was noted.



Recommendations

Three recommendations were made addressing potential improvements to subrecipient monitoring processes. Detailed observations and recommendations are included in this report.

- 1** Ensure the final payment to all subrecipients of the Emergency Rental Assistance Program reflects compliance with the 18-month maximum criteria.
- 2** Enhance subrecipient agreements to clearly define all significant grant criteria.
- 3** Require unique identifiers on all documents supporting services provided to participants impacted by the Violence Against Women Act.

Management Response

The Health, Housing and Human Services department and Social Services division teams have reviewed and agreed with these recommendations. Full responses have been included in this report.



Proactive Efforts

Team members of the Health, Housing and Human Services department's Social Services division, as the primary engagement contacts, have contributed their time and effort to provide access to the information and data cited. These contributions significantly supported the completion of this review. Collaborative efforts are vital to the county's ability to successfully meet objectives, as well as identify, thoroughly analyze, and appropriately respond to risks. We demonstrate our core values, SPIRIT, when we collectively and proactively identify steps to streamline processes, strengthen controls, and mitigate risks.

Special thanks to Brenda Durbin, Erika Silver, Teresa Christopherson, Jennifer Much Grund, Doug Green, and the Social Services team for their contributions and support for this engagement; Joseph Rosevear and Matt Westbrook with the Finance team for sharing their expertise in grant and subrecipient processes; Mark McBride and Dylan Blaylock with the Public & Government Affairs department for their assistance in the report design, formatting, and conducting post-audit administrative tasks; and Jon McDowell with the GIS team for the assistance in developing the map diagram.