

Office of Inspector General City of Jacksonville, Florida



Management Review Clara White Mission

July 1, 2024

A handwritten signature in black ink that reads "Matthew J. Lascell".

Matthew J. Lascell
Inspector General

Executive Summary

The Clara White Mission (CWM), LLC is a non-profit agency that advertises efforts to feed and house homeless persons, provide vocational training programs, and military veteran assistance initiatives within Duval County.

From September 2018 to October 2023, the COJ awarded the CWM 11 grants totaling \$3,647,260.00. The Office of Inspector General (OIG) reviewed the contracts, corresponding grant proposals, and all available documents related to contract compliance.

Background and Allegations

In 2021, a significant event occurred when several CWM board members abruptly resigned and publicly accused the Mission of poor leadership and mismanaging its funding. This led to the OIG opening an investigation to review the allegations, which was later turned over to the Federal Bureau of Investigations (FBI).

The FBI closed its case in 2023 without publishing a disposition or finding. In the same year, the CWM received two additional COJ grants: a \$300,000 direct-award, emergency grant to assist in funding vocational training programs at its White Harvest Farms location and a separate \$150,000 emergency public service grant for its feeding the homeless initiative.

The OIG conducted an administrative review of the Mission's management of City funds and the City's oversight methods to ensure contract compliance.

Governing Directives and Findings

Between 2018 and 2024, the COJ awarded seven Public Service Grant contracts to the CWM totaling \$1,200,000 to support employee salaries that assist with basic operations. Two \$100,000 grants were also awarded for specific maintenance and building repair needs. Oversight for these nine agreements was assigned to the Division of Grants & Contract Compliance (DGCC). During that timeframe, an additional \$1,747,090 contract was awarded to the CWM to assist with building and general operations of the White Harvest Farm location. Oversight for this contract was assigned to COJ's Office of Economic Development.

The OIG reviewed each of the above contracts, corresponding grant proposals, and all documents related to contract compliance. During this review, significant deficiencies in City oversight related to DGCC were discovered.

Each of the PSG contracts awarded to the CWM required the Mission to:

1. "Provide the Grant Administrator with a financial report for each month during the term of the agreement by the 15th of each month that shall include a statement of expenditures made in each budget category in Exhibit A".
-

2. "Provide the Grant Administrator with a quarterly narrative progress report on the program." Specific due dates are listed in each contract."
3. "At least once per year, the Grant Administrator will determine if the Recipient's stated program goals and objectives have been met or if sufficient progress toward meeting those Goals and Objectives has not been made. Failure to maintain sufficient progress in these areas is grounds for termination of the Agreement."

Current DGCC directives state that programmatic reports are due to the DGCC quarterly on January 15, April 15, July 15, and October (the specific date may change depending on the individual contract). This is a contractual requirement that cannot be altered. The quarterly report template will be prepared by the recipient. The DGCC will review it to ensure compliance with the contract and application.

DGCC directives also state that each grant recipient will be formally monitored annually. All PSG funded through the PSG Council will use Public Service Grants Standards. Direct Appropriation grants will be monitored using their specific requirements. This includes a formal in-person site visit to be conducted as early in the contract as possible to allow ample time for any corrective action.

The DGCC did not provide a single contract file containing all required monthly, quarterly, and annual assessments. Many of these files consisted of blank Excel spreadsheets. Out of the contracts the OIG reviewed, only four had documented on-site assessments on file. One of the assessments was complete but was done virtually. The other three were incomplete or illegible.

The OIG examined the three main initiatives offered by the CWM. Findings are as follows:

Vocational Training Programs:

The OIG requested the following records from the CWM: (1) Written descriptions of each training program offered by the CWM. (2) Documentation of client enrollment and client attendance in culinary, janitorial, and construction-related training programs between 2018 and 2023. (3) Documentation of all certifications (including OSHA certifications) awarded to clients between 2018 and 2023. (4) Documentation of all certifications (including OSHA certifications) awarded to employees between 2018 and 2023. (5) Documentation of class schedules and corresponding instructor assignments for all the above training courses. (6) Copies of receipts and documentation of all expenses relating to all training courses provided by the CWM.

CWM Board Chairperson Dinah Mason responded to this request on February 5, 2024. She provided rosters of two culinary training courses administered in 2018 and 2019, corresponding certifications obtained by those clients, and certifications held by CWM instructors. She noted that all vocational training was suspended in 2019 due to the COVID-19 pandemic, and the programs remain non-operational to this date (Exhibit 1).

The CWM website and official letterhead consistently advertised vocational training as an ongoing part of operations between 2019 and 2024, even though this initiative ceased at the onset of the COVID-19 pandemic and did not resume until April 2024.

Feeding the Homeless Initiative:

In each PSG grant contract proposal, the CWM lists a specific number of “unduplicated” and repeat low/no income clients it projects to feed in the upcoming fiscal year. The proposals state: “Customer data is entered into the Homeless Management Information System (HMIS) as customers enroll. The system tracks customers and services they receive on an ongoing basis. Once entered into the system, customers are provided to-go meal boxes and bags (breakfast and lunch). CWM generates monthly, quarterly, and annual reports based on HMIS data.”

Chief Operations Officer (COO) Meg Fisher was asked about the methods and practices for this data collection. She advised the CWM serves a hot breakfast to homeless and in-need clients Saturday through Wednesday between 8:30 a.m. and 10 a.m. They also provide each client with a bag of food items from their pantry. On average, the Mission serves 5,500 to 6,500 clients per month (200-300 clients per day). The chef and kitchen assistant plan a menu each week and cook the meals, and an average of eight additional volunteers assist with service to the clients.

Many years ago, the CWM issued ID cards to clients utilizing the feeding program. Administrators noticed that clients would lose the cards and need to be issued replacements. This made it difficult for the mission to track client data and to differentiate between new and repeat clients. The Mission decided it would be more effective to ask (but not mandate) clients to disclose their names upon receiving a meal. Clients who did not wish to disclose their name to the intake clerks (Mission employees) would be listed as “No Client Data.” Fisher explained that named clients new to the service are issued an identification number, which is used to track all subsequent dates of service for that individual.

Fisher noted that the intake clerks write client names down as provided. The clerks then go back later and input that data into the HMIS system. Fisher advised that these employees and the Mission’s designated HMIS “Super User” could more definitively answer questions regarding when the data is imported into the HMIS system (daily, weekly, monthly, etc.) and the differences between the HMIS data fields (i.e., “Service Date” and “Created Date”) in the corresponding Excel spreadsheet. She could not provide the hand-written intake sheets.

Because the Mission does not require clients to identify themselves, they cannot definitively distinguish between initial unnamed clients and returning unnamed clients. Therefore, it cannot accurately account for new versus returning clients. Fisher stated that the Mission looks at the percentages of new and returning clients who provide their names and applies that same percentage to the unnamed clients. This method can only produce an estimated number of unidentified returning clients. However, in their annual IRS Form 990, the Mission states it serves about 350 clients daily and consistently lists specific numerical goals for initial and returning clients receiving meals in their PSG grant proposals.

The OIG requested the CWM provide copies of the CWM's HMIS submissions. The CWM failed to provide this data and referred Investigators to Changing Homelessness, the non-profit organization that manages HMIS data for Northeast Florida. Administrators at Changing Homelessness provided data submitted by the CWM for October 1, 2022- September 2023 and October 1, 2024- March 2024. Analysis of the data provided showed:

1. The daily meals served ranged from 1 to 831 clients.
2. Significantly more clients declined to provide their names when receiving a meal. (Only 28,117 clients provided a name upon receiving a meal, including several identified as Jane Doe and John Doe, during this timeframe. Approximately 52,837 refused to provide their name and were listed as "No Client Data" when receiving a meal.)
3. Individuals listed as "No Client Data" appeared to receive meals in large groups. (For example, 69 unnamed clients received meals between 10:13 am and 10:48 am on 3/27/2024)
4. The distinction between the "Service Date" and "Created Date" columns is unclear.

The OIG found that the CWM's methods for tracking meal recipients are insufficient and do not coincide with methods described in the grant proposals. These numbers can only be estimated. OIG investigators monitored the CWM's headquarters during meal distribution hours on several occasions and did not observe large numbers of clients waiting to be served meals.

Veteran Assistance:

The OIG submitted a FOIA request to the Veterans Administration (VA). According to VA records, two Notice(s) of Indebtedness were issued to the CWM. The first notice, dated 2/2/2023, stated that the Department of Veterans Affairs Office of Business Oversight (OBO) determined the mission overbilled the VA approximately \$2,496.00. The second notice, dated 6/29/2023, stated that the VA OBO determined the CWM overbilled the VA \$95,604.3 (Exhibit 2). It is unclear if/how these debts have been resolved and what the overbilling was related to. COO Fisher acknowledged that the Mission was repaying the VA for overpayments of per diem. She referred accounting and finance questions to the CWM Finance Director Veronica Chambers.

Recommended Corrective Actions

1. The OIG recommends the following. The DGCC should strengthen document collection processes to oversee non-profit organizations receiving COJ grant funding so that current SOPs are followed more rigorously.
2. Should the CWM continue to list specific target numbers of annual meal recipients in grant proposals, the data collection method should be modified to ensure accuracy. Based on statements made by COO Fisher, the OIG determined that the practiced data collection techniques are not the same as the ones described in the grant proposals, and counts relating to unnamed clients cannot be definitively calculated.

Management's Response

On June 20, 2024, the OIG provided a copy of the draft report of investigative findings to Maribel Hernandez, Acting Chief & Grants Administrator, Grants & Contract Compliance Division. The OIG provided Hernandez with an opportunity to submit a written explanation or rebuttal to the findings in the draft Report of Investigation within 10 business days. On June 28, 2024, Hernandez responded to the report (see attached).

Inspector General Standards

This report/review has been conducted in accordance with the ASSOCIATION OF INSPECTORS GENERAL Principles and Quality Standards for Investigations.

“Enhancing Public Trust in Government Through Independent and Responsible Oversight”



120 Years of Community Service

Food for today. Skills for life.

Vocational Training Programs

Licensed by the State of Florida Commission for Independent Education

Culinary Arts Training
Janitorial Training
Agricultural Training

Programs

CWM Feeding Program
Riverside North
Veteran Housing
Veteran Drop-In Day Center
White Harvest Farms
Dr. Eartha White Historical Museum

Board of Directors

Dinah Mason
Chairperson

Marshelle Berry
Robert Davis
Dr. Sabrina Edwards
Carlton Jones
Linda Price
Ephraim Riggins
Caleena Shirley
Dr. Jevetta Stanford
Latara Sword
Bracy Taylor
Thomas Waters
James Wesley
Pastor Jared Williams
T

CEO/President

Ju' Coby Pittman

Chief Operating Officer

Meg Fisher

February 2, 2022

Richard Samples
Deputy Inspector General
Office of Inspector General
231 E. Forsyth Street, Suite 470
Jacksonville, Florida 32202

Subject: Office of Inspector General (OIG) Case Number 2023-0047

Thank you for the clarification regarding the OIG's request for documents pertaining to the above-noticed investigation. Please refer to the indices below for explanation and data.

#6976-72 (\$150,000 of COJ funds awarded in 2018)

The 2018-19 Public Service Grant award provided funding for the Clara White Mission Feeding Program. One of the program objectives stated: Engage 50 feeding program participants in vocational training or housing programs from Oct 2018 – Sept 2018. Vocational enrollment during the indicated period includes Culinary Training Class # 52 and Culinary Training Class #53. Please find related data reports attached.

#6976-75 (\$150,000 of COJ funds awarded in 2019) The Clara White Mission suspended vocational training during the 2019-20 program year due to the onset of Covid-19.

#6976-76 (1,750,000 of COJ funds awarded in 2019)

Contract #6976-76 provided capital support for construction of a Farmers Market facility at White Harvest Farms on Moncrief Road. There was no associated vocational instruction. All program and financial reporting may be acquired from the Office of Economic Development.

#200558 (597,260.70 of Cares Act funds awarded in 2020)

The Clara White Mission Vocational Training Program remained non-operational.

#616252-21 (\$150,000 of COJ funds awarded in 2020)

The Clara White Mission Vocational Training Program remained non-operational.

#634460-22 (\$150,000 of COJ funds awarded in 2021)

The Clara White Mission Vocational Training Program remained non-operational.

#635951-22 (\$100,000 of COJ funds awarded in 2021)

Contract #635951-22 provided capital support for structural repairs to the Clara White Mission facility, including roofing, fencing, and plumbing. There was no associated vocational instruction.

#653230-23 (\$150,000 of COJ funds awarded in 2022)

The Clara White Mission Vocational Training Program remains non-operational.

We appreciate your interest in our programming and invite you to visit the Clara White Mission to witness for yourself the 120-year body of work the agency has provided and continues to provide, and its impact on the community we serve. If you have additional questions, please feel free to contact us.

Sincerely,

Dinah L. C. Mason

Dinah L. C. Mason
Board Chair
Clara White Mission, Inc.

613 West Ashley St. - Jacksonville, FL 32202 904-354-4162 Fax – 904-791-4360

www.clarawhitemission.org





DEPARTMENT OF VETERANS AFFAIRS

Bill Number(s): Project #: CWMI104-1347-573-PD-21

Date: June 29, 2023

Ju'Coby Pittman
 President/CEO
 Clara White Mission, Inc.
 613 West Ashley Street
 Jacksonville, FL 32202

NOTICE OF INDEBTEDNESS: Our records indicate, your entity has a grant program indebtedness of \$95,604.31. Of the total amount, \$0.00 is a recovery of capital funds and \$95,604.31 is an overpayment of per diem. This indebtedness was caused by:

A financial review conducted by the Department of Veterans Affairs Office of Business Oversight (OBO) determined the agency overbilled the VA; the agency submitted a SF-425 for review and an unobligated funding amount was determined for fiscal year 2022. This is a collection of the overpayment of per diem for this grant.

NOTICE OF RIGHTS: If you do not believe your entity owes this debt or you think the amount is incorrect; your entity has a right to dispute the debt. You also have a right to request a waiver of the debt. If you request a waiver, you have the right to a desk hearing. Additional information concerning these rights is enclosed. ***Please read it carefully.*** Any dispute or questions concerning the existence or amount of this indebtedness, or requests for waivers should be sent to:

U.S. Department of Veterans Affairs
 Debt Management Center
 P.O. Box 11930
 St. Paul, MN 55111

PAYMENT: Please make your check or money order payable to the Department of Veterans Affairs and send it to the address below with the top portion of the next page. Please include your full name, title, entity name, and project number on the check or money order to insure proper credit.

US Department of Veterans Affairs,
 Financial Services Center
 Attn: Agent Cashier Office (0474C)
 PO Box 149975
 Austin, TX 78714-9975

REPAYMENT PLAN: Regardless of whether you dispute the debt or request waiver, if your entity is unable to pay the full amount in one payment, you should contact the Agent Cashier Office within 30 days of the date of this letter to work out a satisfactory repayment plan. You should indicate the amount the entity will pay each month and the date payment will be made. Any reasonable plan will receive careful consideration.

INTEREST & LATE PAYMENT CHARGES: In accordance with 31 U.S.C. 3717, 31 CFR 901.9, and 38 CFR 1.915, debts being repaid by installments will be charged interest at an annual rate of 1.00%. A monthly administrative cost of collection fee of \$1.40 (subject to change annually) may also be charged. A monthly penalty charge will be assessed at 6 percent per annum if a debt is delinquent more than 90 days. If full payment of the debt is received within 30 days, no interest or administrative cost of collection fees will be charged. **Note: VA must refer all eligible debts greater than 120 days delinquent to the Treasury for collection via the Treasury Offset Program or Cross-Servicing Program. We will forward debt to TOPs for failure to pay your debt or contact our office to establish a repayment plan. The full amount of the debt could be collected from any federal payment.** Please disregard this letter if you have recently paid this debt in full. Feel free to contact me if you have any questions regarding this outstanding debt.

Fiscal Section 101

Email: VAFSC Fiscal Section (101) (b)(6) @va.gov

FOR PROPER CREDIT TO YOUR ACCOUNT, PLEASE DETACH AND RETURN WITH YOUR PAYMENT

PAYMENT REMITTANCE				
* Bill Number (Project #):	NAME OF ENTITY	AMOUNT ENCLOSED		YOUR TELEPHONE NO. <i>(Include Area Code)</i>
	Clara White Mission, Inc.	\$		
ENTER YOUR ENTITY'S CURRENT ADDRESS BELOW ONLY IF THE ONE ABOVE IS INCORRECT. PLEASE INCLUDE YOUR ZIP CODE.				
*Please include this number on your check or money order.				

NOTICE OF RIGHTS AND OBLIGATIONS

DEBTS OWED THE UNITED STATES GOVERNMENT: The law requires that the Department of Veterans Affairs (VA) collect debts owed the government. Any current or future federal payments, including other grant payments, made by VA or any other federal entity may be withheld. Your entity's debt may also be referred to the Department of Treasury for collection. You have the right to inspect or to request a copy of any record relating to the debt.

NOTE: Whenever this letter states that you have a period of time to take some action or to notify us, the period of time begins to run from the date appearing on the front of this letter.

RIGHT TO DISPUTE THE EXISTENCE OR AMOUNT OF THE DEBT: If you believe your entity does not owe the debt, or you feel the amount is incorrect, you have the right to dispute. To do so, you must explain in writing why you question the validity of the debt or the amount. As explained below, if your dispute is received timely, we will suspend any collection action until we confirm that the debt is valid and the amount is correct. **If the delay required to resolve your dispute prevents us from collecting the full amount of your debt, collection action will not be suspended.** If we determine that the debt and the amount are correct, you have the right to appeal our decision to the Board of Veterans Appeals in accordance with Parts 19 and 20 of title 38 of the U.S. Code of Federal Regulations (CFR).

RIGHT TO REQUEST WAIVER OF THE DEBT: Under certain circumstances, we can grant a request to waive all or part of a debt that arises from an overpayment under the grant program. This means that your entity will not be required to pay the amount waived. Your request for waiver must be submitted in writing **within 180 days of the date of this letter**. You should explain any responsibility your entity had in causing the debt or why your entity believes it is not responsible. If you feel there are circumstances that show collection of the debt would be inequitable to your entity, or collection of the debt will cause you undue hardship, explain it in your request. You must submit evidence with your waiver request to substantiate any claim of financial hardship. Please be advised that a waiver cannot be granted if we determine that fraud, misrepresentation, or bad faith exists on your part in the creation of the debt.

EFFECT OF A DISPUTE OR WAIVER REQUEST ON WITHHOLDING OF BENEFITS: If we receive your entity's dispute and/or waiver request within 30 days of the date of this letter, we will not begin to withhold any current or future federal payments or grants until a decision is made on your dispute or request for waiver. VA will pursue collection action once an adverse initial decision is reached on your dispute or request for waiver, even if your entity subsequently pursues appellate relief in accordance with Parts 19 and 20 of title 38 of the Code of Federal Regulations. If your dispute or request for waiver is not received within 30 days, we will begin to withhold any current or future federal payments or grants as soon as possible after the 30 day period expires. The withholding will continue while we consider your dispute or waiver request. If VA subsequently agrees with your dispute or a waiver is granted, any amounts withheld (up to the amount waived) will be refunded.

DESK HEARING ON WAIVER REQUEST: You may request a desk hearing to present evidence or argue any point in connection with your waiver request. If you want a hearing, you must request it when you submit your request for waiver. This will allow us to schedule the hearing before we make a decision on your waiver request. If you request a hearing, we will notify you of the date, time and place where the hearing will be held. You may bring witnesses, and all testimony will be entered into the record. We cannot bear any other expense for the hearing.

ADMINISTRATIVE COST OF COLLECTION FEES: The monthly administrative cost of collection fee will not be added to your entity's debt if, within 30 days, full payment of the debt is received or an acceptable repayment plan is worked out. Other costs of collection may also be added to the debt if additional actions become necessary.

REPRESENTATION: An accredited representative of a veterans' organization or other service organization recognized by the Secretary of Veterans Affairs may represent your entity, without charge. You may employ an attorney to assist your entity, for example, an attorney in private practice or a legal aid attorney. The services of an attorney representing you in adjudicative proceedings before VA are subject to a fee limitation as set forth in 38 U.S.C. 5904. If you desire representation and have not already designated a representative, let us know and we will send you the necessary forms. If an attorney or accredited agent represents you before VA, a copy of any agreement between you and the attorney or accredited agent about the payment of the attorney's or agent's fees must be filed at the following address: Counsel to the Chairman (01C3), Board of Veterans Appeals, 810 Vermont Avenue NW, Washington, DC 20420.



DEPARTMENT OF VETERANS AFFAIRS

Bill Number(s): Project #: CWMI104-0660-573-SC-18-0;
 CWMI104-0624-573-SI-18-0; CWMI104-0783-573-SI-19;
 CWMI104-0625-573-BH-18

Date: February 2, 2023

Ju'Coby Pittman
 President/CEO
 Clara White Mission
 613 West Ashley Street
 Jacksonville, FL 32202

NOTICE OF INDEBTEDNESS: Our records indicate, your entity has a grant program indebtedness of \$2,496.00. Of the total amount, \$0.00 is a recovery of capital funds and \$2,496.00 is an overpayment of per diem. This indebtedness was caused by:

A financial review conducted by the Department of Veterans Affairs Office of Business Oversight (OBO) determined the agency overbilled the VA; the agency was sent a copy of the review and a pre-determination letter of the possible debt owed for their review and response. The agency responded to the OBO findings. This is a collection of the overpayment of per diem for this grant.

NOTICE OF RIGHTS: If you do not believe your entity owes this debt or you think the amount is incorrect; your entity has a right to dispute the debt. You also have a right to request a waiver of the debt. If you request a waiver, you have the right to a desk hearing. Additional information concerning these rights is enclosed. ***Please read it carefully.*** Any dispute or questions concerning the existence or amount of this indebtedness, or requests for waivers should be sent to:

U.S. Department of Veterans Affairs
 Debt Management Center
 P.O. Box 11930
 St. Paul, MN 55111

PAYMENT: Please make your check or money order payable to the Department of Veterans Affairs and send it to the address below with the top portion of the next page. Please include your full name, title, entity name, and project number on the check or money order to insure proper credit.

US Department of Veterans Affairs,
 Financial Services Center
 Attn: Agent Cashier Office (0474C)
 PO Box 149975
 Austin, TX 78744-8975

REPAYMENT PLAN: Regardless of whether you dispute the debt or request waiver, if your entity is unable to pay the full amount in one payment, you should contact the Agent Cashier Office within 30 days of the date of this letter to work out a satisfactory repayment plan. You should indicate the amount the entity will pay each month and the date payment will be made. Any reasonable plan will receive careful consideration.

INTEREST & LATE PAYMENT CHARGES: In accordance with 31 U.S.C. 3717, 31 CFR 901.9, and 38 CFR 1.915, debts being repaid by installments will be charged interest at an annual rate of 1.00%. A monthly administrative cost of collection fee of \$1.94 (subject to change annually) may also be charged. A monthly penalty charge will be assessed at 6 percent per annum if a debt is delinquent more than 90 days. If full payment of the debt is received within 30 days, no interest or administrative cost of collection fees will be charged. **Note: VA must refer all eligible debts greater than 120 days delinquent to the Treasury for collection via the Treasury Offset Program or Cross-Servicing Program. We will forward debt to TOPs for failure to pay your debt or contact our office to establish a repayment plan. The full amount of the debt could be collected from any federal payment.** Please disregard this letter if you have recently paid this debt in full. Feel free to contact me if you have any questions regarding this outstanding debt.

Fiscal Section 101

Email: VAFSC Fiscal Section (101) (b)(6) @va.gov

FOR PROPER CREDIT TO YOUR ACCOUNT, PLEASE DETACH AND RETURN WITH YOUR PAYMENT

PAYMENT REMITTANCE				
* Bill Number (Project #):	NAME OF ENTITY	AMOUNT ENCLOSED		YOUR TELEPHONE NO. <i>(Include Area Code)</i>
	Clara White Mission	\$		
ENTER YOUR ENTITY'S CURRENT ADDRESS BELOW ONLY IF THE ONE ABOVE IS INCORRECT. PLEASE INCLUDE YOUR ZIP CODE.				
*Please include this number on your check or money order.				

NOTICE OF RIGHTS AND OBLIGATIONS

DEBTS OWED THE UNITED STATES GOVERNMENT: The law requires that the Department of Veterans Affairs (VA) collect debts owed the government. Any current or future federal payments, including other grant payments, made by VA or any other federal entity may be withheld. Your entity's debt may also be referred to the Department of Treasury for collection. You have the right to inspect or to request a copy of any record relating to the debt.

NOTE: Whenever this letter states that you have a period of time to take some action or to notify us, the period of time begins to run from the date appearing on the front of this letter.

RIGHT TO DISPUTE THE EXISTENCE OR AMOUNT OF THE DEBT: If you believe your entity does not owe the debt, or you feel the amount is incorrect, you have the right to dispute. To do so, you must explain in writing why you question the validity of the debt or the amount. As explained below, if your dispute is received timely, we will suspend any collection action until we confirm that the debt is valid and the amount is correct. **If the delay required to resolve your dispute prevents us from collecting the full amount of your debt, collection action will not be suspended.** If we determine that the debt and the amount are correct, you have the right to appeal our decision to the Board of Veterans Appeals in accordance with Parts 19 and 20 of title 38 of the U.S. Code of Federal Regulations (CFR).

RIGHT TO REQUEST WAIVER OF THE DEBT: Under certain circumstances, we can grant a request to waive all or part of a debt that arises from an overpayment under the grant program. This means that your entity will not be required to pay the amount waived. Your request for waiver must be submitted in writing **within 180 days of the date of this letter**. You should explain any responsibility your entity had in causing the debt or why your entity believes it is not responsible. If you feel there are circumstances that show collection of the debt would be inequitable to your entity, or collection of the debt will cause you undue hardship, explain it in your request. You must submit evidence with your waiver request to substantiate any claim of financial hardship. Please be advised that a waiver cannot be granted if we determine that fraud, misrepresentation, or bad faith exists on your part in the creation of the debt.

EFFECT OF A DISPUTE OR WAIVER REQUEST ON WITHHOLDING OF BENEFITS: If we receive your entity's dispute and/or waiver request within 30 days of the date of this letter, we will not begin to withhold any current or future federal payments or grants until a decision is made on your dispute or request for waiver. VA will pursue collection action once an adverse initial decision is reached on your dispute or request for waiver, even if your entity subsequently pursues appellate relief in accordance with Parts 19 and 20 of title 38 of the Code of Federal Regulations. If your dispute or request for waiver is not received within 30 days, we will begin to withhold any current or future federal payments or grants as soon as possible after the 30 day period expires. The withholding will continue while we consider your dispute or waiver request. If VA subsequently agrees with your dispute or a waiver is granted, any amounts withheld (up to the amount waived) will be refunded.

DESK HEARING ON WAIVER REQUEST: You may request a desk hearing to present evidence or argue any point in connection with your waiver request. If you want a hearing, you must request it when you submit your request for waiver. This will allow us to schedule the hearing before we make a decision on your waiver request. If you request a hearing, we will notify you of the date, time and place where the hearing will be held. You may bring witnesses, and all testimony will be entered into the record. We cannot bear any other expense for the hearing.

ADMINISTRATIVE COST OF COLLECTION FEES: The monthly administrative cost of collection fee will not be added to your entity's debt if, within 30 days, full payment of the debt is received or an acceptable repayment plan is worked out. Other costs of collection may also be added to the debt if additional actions become necessary.

REPRESENTATION: An accredited representative of a veterans' organization or other service organization recognized by the Secretary of Veterans Affairs may represent your entity, without charge. You may employ an attorney to assist your entity, for example, an attorney in private practice or a legal aid attorney. The services of an attorney representing you in adjudicative proceedings before VA are subject to a fee limitation as set forth in 38 U.S.C. 5904. If you desire representation and have not already designated a representative, let us know and we will send you the necessary forms. If an attorney or accredited agent represents you before VA, a copy of any agreement between you and the attorney or accredited agent about the payment of the attorney's or agent's fees must be filed at the following address: Counsel to the Chairman (01C3), Board of Veterans Appeals, 810 Vermont Avenue NW, Washington, DC 20420.



A NEW DAY.

City of Jacksonville, Florida

Donna Deegan, Mayor

Department of Finance
117 West Duval Street, Suite 300
Jacksonville, FL 32202
(904) 630-CITY
www.coj.net

June 28, 2024

Ms. Christina Gatto, MPA
Senior Program Coordinator
Accreditation Manager
Office of Inspector General
City of Jacksonville
231 East Forsyth Street, Suite 470
Jacksonville, FL 32202

Dear Ms. Gatto:

RE: Office of Inspector General Report of Investigation (Draft) 2023-0047

I am in receipt of the draft investigation report referenced above for a response to the findings. I am unable to respond to the specific findings outlined as I was not in the division at the time and do not have direct knowledge of the contracts referenced.

I am able to respond to Recommended Action #1 on page 5 and advise that the Division of Grants and Contract Compliance (DGCC) currently has an effort underway to review, revise and revamp all its internal Standard Operating Procedures (SOPs) in order to strengthen them by ensuring that they are clear and accurate. We intend to fully ensure that processes are followed consistently as we execute our duties of contract oversight.

Sincerely,

Maribel Hernandez, MBA, DTM, MFP
Acting Chief & Grants Administrator, Grants & Contract Compliance
City of Jacksonville
214 North Hogan Street, Suite 800
Jacksonville, FL 32202
(904) 255-5356
hernandezm@coj.net