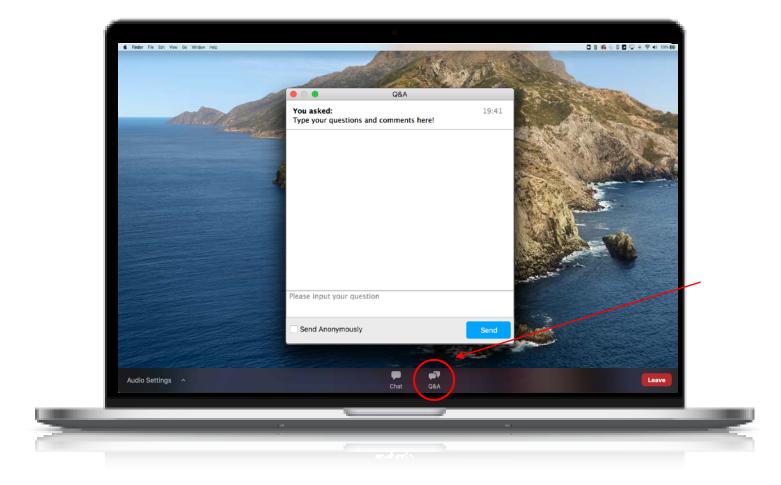# CARES Act Local Government Program

Recipient Weekly Briefing

October 27, 2020

Briefing Objectives

Eligible Expenditures

Program Overview &
Florida CARES Act Management
System (FLCARES)

Eligible Expenditures

THE FLORIDA DIVISION OF EMERGENCY MANAGEMENT

Definition of Eligible Expenditures

1   Necessary expenditures incurred due to the public health emergency;

2   Costs not accounted for in the most recently approved budget as of March 27, 2020 (the date of enactment of the CARES Act); and

3   Costs were incurred between March 1, 2020 and December 30, 2020

Expense Categories

Eligible time period – March 1, 2020 to December 30, 2020

✓ Public health expenses – Administrative leave

✓ Food programs

✓ Nursing home assistance

- ## <u>Eligible Expenses:</u>
  - Expenses of providing paid sick and paid family medical leave to public employee to enable compliance with COVID-19 public health precautions are eligible costs.

  - Administrative leave costs may be covered under this program if:
    - (1) the leave is over and above normal budgeted leave that would be provided to employees; and
    - (2) the leave is necessary to ensure safety and reduce the spread of COVID-19 infections.

Narrative:

On August 4, 2020, our county water clerk was informed that a member of her household had contracted COVID and she had been exposed. To prevent spread in the county's facilities, our employee quarantined at home from 8/5/2020 to 8/11/2020 and was unable to work. Per our attached COVID-19 administrative leave policy, we continued to pay the full salary and benefits for this employee for this week until they were able to safely return to work. Our policy is not to require employees to take their allocated sick or administrative leave for COVID related illness or quarantine, and so we consider this an unbudgeted expense.

Examples of Supporting Documentation:

- Payroll register

- Proof of payment in the form of paystubs/direct deposit receipt to show the leave was paid

- Leave policy prior to COVID

- Leave policy related to COVID

- Support that the leave was related to COVID (e.g., specific COVID leave code the leave was paid to; timesheets showing time marked as COVID leave; communication with the employee regarding the leave due to COVID)

Programs dedicated to supporting individuals impacted during the COVID-19 crisis by providing nutritional support and all other associated costs.

- Narrative Example
  - The County purchased various bulk food items and hygiene products in an effort to aide the community impacted by the COVID-19 public health emergency. The County partnered with the County's Help Center to deliver boxes to community members directly impacted by COVID-19. Specifically, County employees with EMA & EMS built food boxes (135+) and delivered them to food drive locations which were distributed in April and May 2020. In order to complete these food drives, the County rented a large walk-in freezer to store frozen food in until it could be given out. The County also partnered with a local delivery service and stored frozen and cold foods in a refrigerated truck. The County paid for the diesel fuel to run the unit 24/7 for three weeks. These products where not budgeted in the budget as of March 27, 2020 and were incurred by the County as a direct result of COVID-19.

- Documents:
  - Invoice

  - Proof of payment (receipt)

  - Proof of delivery (if applicable) – At minimum need to attest to proof of delivery in narrative

- **Nursing Home Expenses**
  - Expenses related to mitigating or responding to the COVID-19 public health emergency in assisted living or nursing home facilities.
    - Transportation of patients to and from facility
    - Acquiring and distributing PPE for residents or staff
    - Expenses establishing telemedicine capabilities for facilities
    - Disinfecting of public areas or facilities
    - Testing
    - Conversion of space to ensure social distancing and compliance with other CDC recommended polices

- Narrative
  - The County purchased 18 tablets with wireless connectivity and video-conferencing capability to allow residents access to telemedicine consultations with their usual medical providers including primary care and specialist. The interface will allow the County to protect the residents from possible exposure to COVID-19 by having to leave the property unnecessarily for routine medical appointments.

- Documents:
  - Invoice
  - Proof of payment (receipt)
  - Proof of delivery (if applicable)

Recap on Supporting Documentation

Most expenses will need at minimum the supporting documents listed below:

- Detailed narrative
- Invoice
- Proof of payment (receipt)
- Proof of delivery (if applicable) – At minimum need to attest to proof of delivery in narrative
- *Note – the same type of supporting documentation will be needed from any subrecipients the county has created for the county to submit into FLCARES on their behalf*

Public Health & Safety Payroll Specific:

- Brief narrative
- Payroll register or summary for dates claimed (Gross pay)
- Employee roster – including assigned department, employee title, employee pay rates, and fringe benefit rates
- Payroll policy

Most programs (e.g., small business, individual assistance) will need at minimum the supporting documents listed below:

• City/county board meeting minutes where program was approved

• Program guidelines

• City ordinances

• Guideline amendments, funding agreements

• *Awardee* applications

• Sub recipient records and/or General ledger detail

• Payment support to awardees

- Submit as one RAV or RFR to the extent possible (i.e., for completed programs)

- If a program is still ongoing and it's necessary to submit multiple RAVs or RFRs for a single program, be sure to put in your narrative each time the initial RAV or RFR number that the program is related (e.g., …This submission is for an additional 200 awardees in the county's small business program. The original submission for the county's small business program was RFR #105.)

- Batch together to the extent possible (i.e., don't submit support for awardees one at a time)

- Treasury has clarified that for a cost to be considered to have been incurred, performance or delivery **MUST** occur during the covered period but payment of funds need not be made during that time (though it is generally expected that this will take place within 90 days of a cost being incurred).

- Given that it is not always possible to estimate with precision when a good or service will be needed, the touchstone in assessing the determination of need for a good or service during the covered period will be reasonableness at the time delivery or performance was sought, e.g., the time of entry into a procurement contract specifying a time for delivery. Similarly, in recognition of the likelihood of supply chain disruptions and increased demand for certain goods and services during the COVID-19 public health emergency, if a recipient **_enters into a contract requiring the delivery of goods or performance of services by December 30, 2020,_** the failure of a vendor to complete delivery or services by December 30, 2020, will not affect the ability of the recipient to use payments from the Fund to cover the cost of such goods or services if the delay is due to circumstances beyond the recipient's control.

Program Overview & Funding Disbursement in Florida CARES Act Management System (FLCARES)

www.flcaresact.com

Website includes:
Portal Login (FLCARES)
Webinar Recordings
FAQs
Other Relevant Information

RFR Best Practices

- Tutorial video on RFR submission can be found on each jurisdiction's dashboard & within the October 13th webinar recording:
  - www.flcaresact.com/local-government-webinar
  - Tutorial on RAV will be posted to dashboards this week (process demo today)

- Instructional video should be watched prior to submitting the first RAV & RFR

- Recipient Guidelines need to be read prior to submitting the first RAV & RFR

RFR & RAV Best Practices

- Please ensure support and narratives are organized and detailed to expedite review and funding process

- Detailed narrative is required for all RFRs & RAVs submitted

- Aggregate expenses within the same category when submitting RFRs & RAVs

- For users with portal access needing technical support, please email support@flcaresact.com

- Phase 1 & Phase 2 criteria must be met before Phase 3 – System access will not be granted until Phase 3

- System access is limited to 2 contacts per county
  - County Liaisons will collect primary & secondary contact information

- Instructions for system access will be provided once the county's login information is established

- FLCARES will be utilized to submit:

  - Request for reimbursement (RFR) for Phase 3 funding

  - Request for Advance Validation (RAV) for uploading supporting documentation to substantiate Phase 1 & Phase 2 funding
    - This process is to validate the advanced amounts that have been distributed in Phase 1 & Phase 2 – this process does not trigger additional disbursement.
    - Process will be live following the webinar

  - Processes will run parallel to each other

Request for Advance Validation (RAV) DEMO

- November 16th – Submit all documentation for Phase 1 & Phase 2, or the County will not be eligible to continue receiving reimbursement in Phase 3.
  - The county can continue to submit RFRs, but the RFRs will not be processed after November 16th *until* the Phase 1 & Phase 2 requirements have been met.

- December 3rd – All RFRs must be submitted into FLCARES

Next Steps

- Submit spending plan & quarterly reports/encumbrance support (as applicable) to support@flcaresact.com

- Execute amendment to the Funding Agreement

- Provide primary & secondary contact information to assigned county liaison, if not yet provided

- Attend all Tuesday webinars in October & November

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Eligibility Updates and Q&A