

**SPARK ROUND 1 - LOCAL GOVERNMENT  
 REIMBURSEMENT & DIRECT AID REVIEW  
 MEMORANDUM**

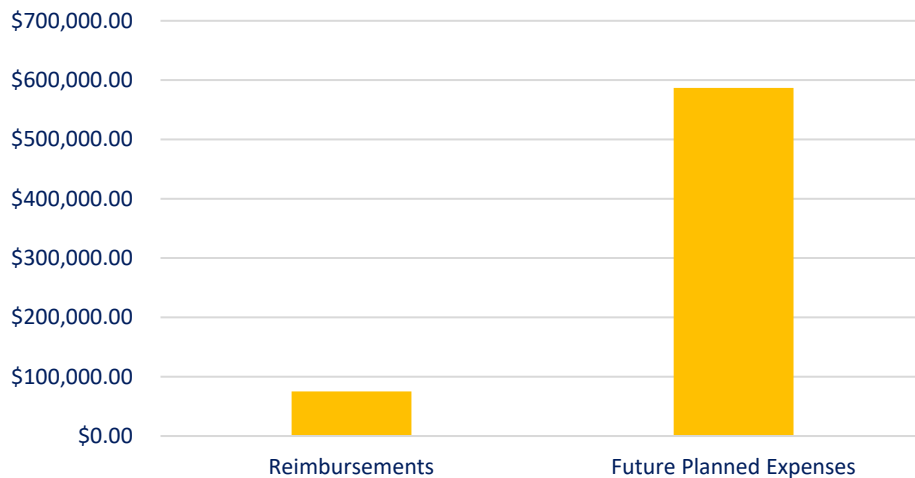
**Date** September 3, 2020  
**Re** Review of Reimbursement and Direct Aid Spending Plan for Chautauqua County

**General Information**

Population: 3,250  
 COVID-19 Cases as of 08/17/2020: 7

Total Allocation Amount: \$662,030.69  
 Total Submitted for Reimbursement: \$75,067.50  
 Total Submitted for Future Planned Expenditures: \$586,963.19

**SPENDING PLAN OVERVIEW**



**Reimbursement Request Overview**

Total Amount for County Expenditures: \$3,860.27  
 Total Amount for Subrecipients: \$71,207.23

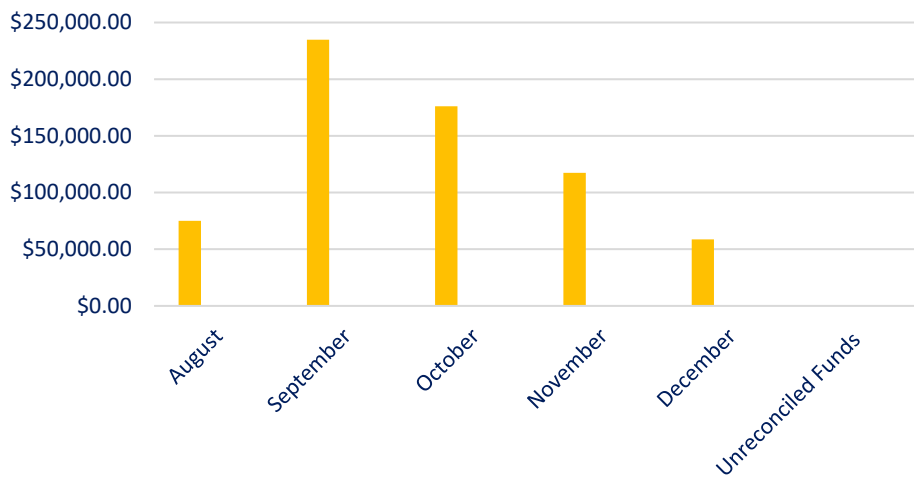
**Subrecipients and Amounts**

Subrecipient	Type	Amount
City of Cedar Vale	City	\$270.05
Sedan Area EMS	Health	\$1,270.02
USD 285	Educational Institution	\$26,965.82
USD 286	Educational Institution	\$42,701.34
<b>Total</b>		<b>\$71,207.23</b>

**Direct Aid Overview – Future Spending Plan**

Total Amount for County Expenditures: \$146,740.50  
 Total Amount for Transfers: \$0  
 Total Amount for Programs: \$440,223.00

**PROJECT SPEND DOWN RATE**



**Proposed Programs**

Program Title	Program Description	Program Budget Amount
County Public Grant Program	Small businesses, including not for profits, schools and cities who have been significantly impacted by COVID-19. We propose the following plan to help the community.	\$440,223.00
<b>Total</b>		<b>\$440,223.00</b>

**Definitions**

General Considerations – Summarizes county expenditure data.

Technical Understanding of SPARK Process – Assesses compliance of applicant expenditure information with SPARK guidance.

Identified Compliance Considerations – Highlights requested items that may present potential complications for CRF support eligibility.

Spending Plan Request for Additional Information – Specifies what information is still needed from the recipients.

Modifications Required – Requests any changes still needed to a Reimbursement or Direct Aid plan for proper review.

**Conclusion** – Gauges whether the county’s plan has sufficient information to move forward in the eligibility review process and highlights any remaining concerns.

## General Considerations

Chautauqua County has prioritized its reimbursement requests for the City of Cedar Vale, Sedan Area EMS, and Educational Institutions. These subrecipients’ requests amount to 94.86% of the \$75,067.50 in total submitted reimbursement requests. The two listed Educational Institutions – USD 285 and USD 286 – took the bulk of these requests at a combined \$69,667.16.

The County has prioritized Program costs for its direct aid requests. It plans to sponsor a \$440,223.00 grant program for small businesses, nonprofits, schools, and cities, accounting for 75% of total submitted future planned expenditures. No transfers to subrecipients were listed in the direct aid plan, with independent County expenses accounting for the remaining quarter of submitted requests.

The County should ensure that these expenses respond clearly to purpose and intent of CRF funding, meets all eligibility criteria and will be documented to the county file to support the expense incurred before December 30, 2020.

## Technical Understanding of SPARK Process

Chautauqua County and its subrecipients demonstrate a generally proficient understanding of the intent of the SPARK committee and reporting expectations as exemplified by their detailed reporting of expenditures for reimbursements and direct aid.

## Identified Considerations

### 1. Payroll Expenses

The matter of reimbursement for previously budgeted but substantially dedicated public safety and public health staff to COVID-19 related responsibilities remains an item of subjective interpretation. The Office of Recovery understands that many Counties and Cities are intending to utilize funding provided through CRF to account for this staff time. At this time, consistent with recently released guidance, the Office of Recovery has determined that the County may proceed with reimbursing the following payroll expenses:

- COVID-19 related FFCRA and FMLA leave costs
- Payroll for budgeted personnel and services diverted to a substantially different use than previously budgeted position (example: utility clerk re-assigned to support contact tracing)
- Previously unbudgeted staff hired to assist with COVID-19 related response or mitigation.
- Payroll for budgeted public safety and public health personnel that are considered substantially dedicated to preparing for, mitigating against or responding to COVID-19, and whose actions can be clearly documented. Public safety employees would include police officers (including state police officers), sheriffs and deputy sheriffs, firefighters, emergency medical responders, correctional and detention officers, and those who directly support such employees such as dispatchers and supervisory personnel. Public health employees would include employees involved in providing medical and other health services to patients and supervisory personnel, including medical staff assigned to schools, prisons, and other such institutions, and other support services essential for patient care (e.g., laboratory technicians) as well as employees of public health departments directly engaged in matters related to public health and related supervisory personnel.

- Overtime cost burden associated with public safety, public health, health care, human services, or other employees experienced by the County, Cities or Schools as a result of increased workload associated with mitigating or responding to COVID-19 -or- backfill coverage as a result of staffing shortages tied to COVID-19 (including as a result of staff out due to a qualifying FFRCA or FMLA leave).

The U.S. Treasury's Office of Inspector General recently released additional guidance on how payroll expenses should be documented (OIG-CA-20-028; #62, 69-71). The County should ensure that all payroll is documented compliant to the OIG Guidance.

## 2. County Grant Program

\$440,223  
Direct Aid

As this is identified as a grant program, additional information is requested, including a description of how applicants will apply and be selected. Additionally, the County should ensure they have the appropriate level of administrative capacity to effectively monitor these subrecipients.

### Spending Plan Request for Additional Information

No additional information is requested at this time.

### Modifications Required

No modifications are required for the Reimbursement and Direct Aid Plan documents at this time.

### Conclusion

1. Based on the documents provided by Chautauqua County, it appears they have a good understanding of the eligibility requirements relative to CARES Act funding and have appropriately followed this process.
2. Chautauqua County has an appropriate Project Spend Down Rate representing a low risk of funds not being expended on or before December 30, 2020.
3. For the County Grant Program, if not already in place, Chautauqua County should consider development of an application process and establish a review committee to ensure equal access to funds from potential qualified applications. The County should also appropriately advertise the program within the community.

Subject to review of the considerations outlined in this memo, Chautauqua County may proceed with implementation of its CARES Act funding allocation as outlined in its provided reimbursement and direct aid plan.