

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

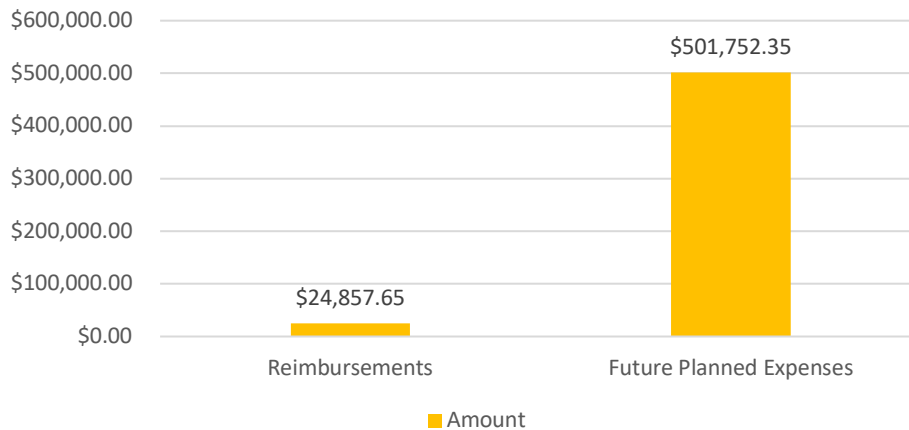
Date September 3, 2020
Re Review of Reimbursement and Direct Aid Spending Plan for Cheyenne County

General Information

Population: 2,657
 COVID-19 Cases 08/17/2020: 5

Total Allocation Amount: \$526,609.63
 Total Submitted for Reimbursement: \$24,857.65
 Total Submitted for Future Planned Expenditures: \$501,752.35

SPENDING PLAN OVERVIEW



Reimbursement Request Overview

Total Amount for County Expenditures: \$13,962.79
 Total Amount for Subrecipients: \$10,894.86

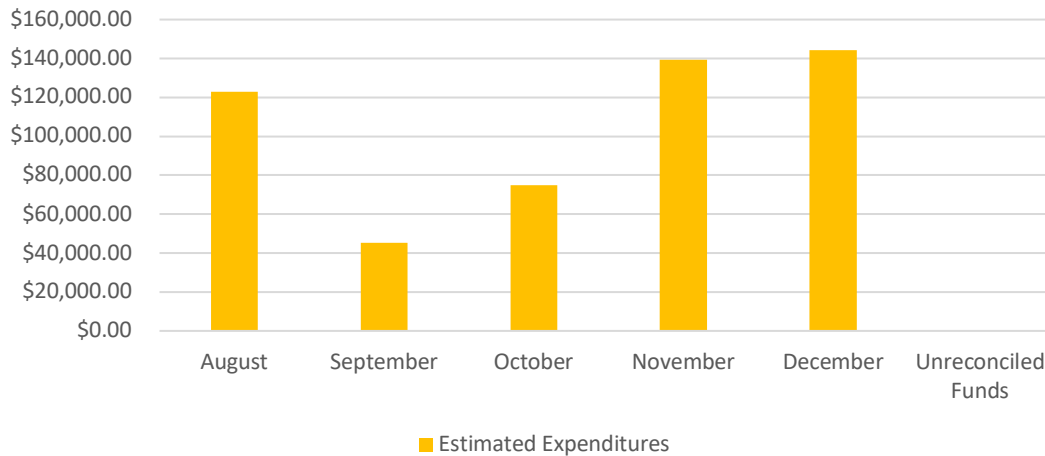
Subrecipients and Amounts

Subrecipient	Type	Amount
USD 297	Educational Institution(s)	\$5,430.67
USD 103	Educational Institution(s)	\$4,527.72
City of St Francis	City	\$936.47
Total		\$10,894.86

Direct Aid Overview – Future Spending Plan

Total Amount for County Expenditures: \$144,624.64
 Total Amount for Transfers: \$271,300.64
 Total Amount for Programs: \$85,827.07

PROJECT SPEND DOWN RATE



Subrecipients/Transfers and Amounts

Subrecipient	Type	Amount
Cheyenne County Village	Non-Profit	\$26,450.00
Cheyenne County Hospital	Public Hospital	\$85,500.48
Bird City Housing Authority	Governmental Organization	\$16,605.98
City of Saint Francis	City	\$49,311.70
St. Francis Community Schools	Educational Institution(s)	\$43,325.00
USD 103	Educational Institution(s)	\$50,107.48
Total		\$271,300.64

Proposed Programs

Program Title	Program Description	Program Budget Amount
COVID Recovery Program	A financial assistance program made available by Phase 1 SPARK Funds and the Cheyenne County Commissioners to Cheyenne County small businesses, non-profits, local government entities and individuals affected by COVID.	\$85,827.07

Small businesses, non-profits, other local government entities and individuals have been financially impacted by COVID due to mandatory shut downs and public safety requirements. We propose this program to assist those that demonstrate a determined need and have not already been funded by other assistance programs.

Total **\$85,827.07**

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

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

Cheyenne County and its subrecipients demonstrate a generally proficient understanding of the SPARK eligibility standards as exemplified by their detailed reporting of expenditures for reimbursements and direct aid. Our identified risks and compliance considerations for these are outlined below.

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. Bird City Housing Authority Renovation

\$16,605.98
Direct Aid

The County should ensure that any construction projects are completed within the CRF eligibility period that closes on December 30, 2020.

3. Cheyenne County Hospital Renovation

\$50,500.48
Direct Aid

The County should ensure that any construction projects are completed within the CRF eligibility period that closes on December 30, 2020.

4. City of Saint Francis Renovations

\$49,311.70
Direct Aid

The County should ensure that any construction projects are completed within the CRF eligibility period that closes on December 30, 2020.

5. COVID-19 Recovery Program

\$85,827.07

Direct Aid

The County should ensure there is a process for how applicants will apply and be selected.

6. Cheyenne County EMS Equipment

\$43,898.48

Direct Aid

The items under consideration include a power cot and power load purchase and installation for an ambulance. More information is needed to demonstrate whether these costs were incurred as a result of the COVID-19 pandemic. Additionally, each of these costs is expected to be incurred on December 31, 2020, which is outside of the CRF eligibility period.

Spending Plan Request for Additional Information

The following items require additional information for the State to feel comfortable with proceeding

Item	Recipient	Amount	Comment
COVID-19 Recovery Program	Cheyenne County	\$85,827.07	More information is needed regarding the application and selection process for this grant program.

Modifications Required

No modifications are requested at this time.

Conclusion

1. Based on the documents provided by Cheyenne County, it appears they have a good understanding of the eligibility requirements relative to CARES Act funding and have appropriately followed this process.
2. Cheyenne County should provide responses to all requests for additional information outlined in this memo.
3. Cheyenne County has an appropriate projected project spend down rate in accordance with program guidelines and eligibility, however, the County should make note that the covered period for expenditures ends on December 30, 2020.
4. For the COVID-19 Recovery Program, if not already in place, Cheyenne 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 additional documentation requested and considerations regarding payroll expenses, Cheyenne County may proceed with implementation of its CARES Act funding allocation as outlined in its provided reimbursement and direct aid plans.