

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

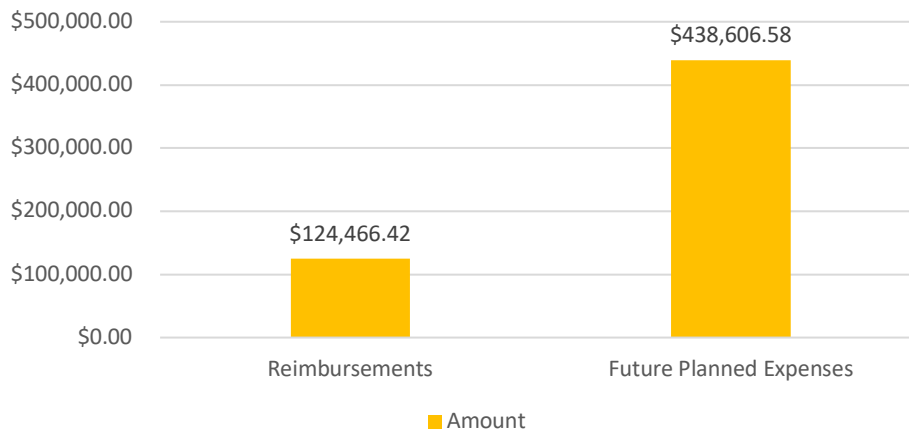
**Date** September 3, 2020  
**Re** Review of Reimbursement and Direct Aid Spending Plan for Edwards County

**General Information**

Population: 2,798  
 COVID-19 Cases 08/17/2020: 19

Total Allocation Amount: \$563,072.76  
 Total Submitted for Reimbursement: \$124,466.42  
 Total Submitted for Future Planned Expenditures: \$438,606.58

**SPENDING PLAN OVERVIEW**



**Reimbursement Request Overview**

Total Amount for County Expenditures: \$63,943.59  
 Total Amount for Subrecipients: \$60,522.83

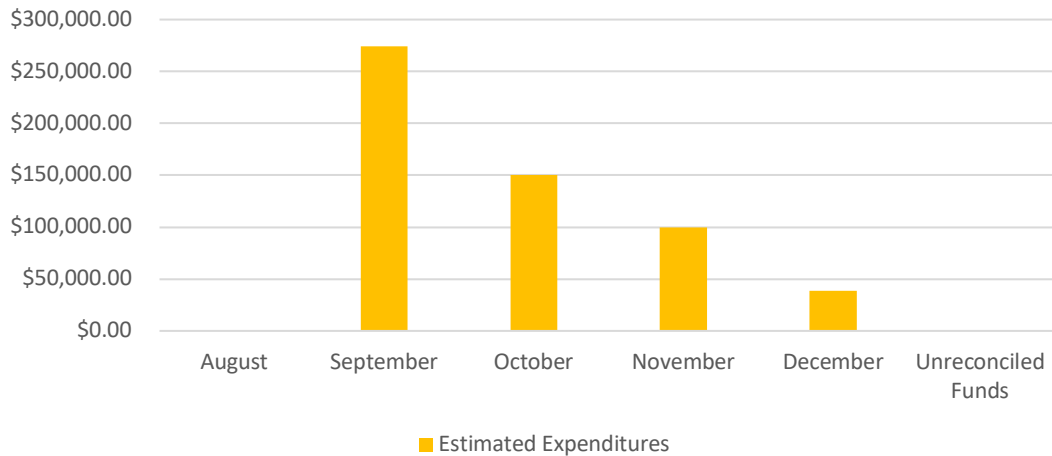
**Subrecipients and Amounts**

Subrecipient	Type	Amount
USD 347	Educational Institution(s)	\$24,772.17
Lewis City	City	\$3,970.25
USD 502	Educational Institution(s)	\$31,780.41
<b>Total</b>		<b>\$60,522.83</b>

### Direct Aid Overview – Future Spending Plan

Total Amount for County Expenditures: \$360,418.47  
 Total Amount for Transfers: \$64,188.11  
 Total Amount for Programs: \$14,000.00

#### PROJECT SPEND DOWN RATE



#### Subrecipients/Transfers and Amounts

Subrecipient	Type	Amount
Edwards County EMS	Business	\$30,930.22
City of Kinsley	City	\$9,026.07
USD 347	Educational Institution(s)	\$24,231.82
<b>Total</b>		<b>\$64,188.11</b>

#### Proposed Programs

Program Title	Program Description	Program Budget Amount
Internet Access for Students	Due to the COVID 19 pandemic, the school district is planning for the likeliness of Hybrid or Remote learning should schools need to close down because of direct exposure to the virus or the need to curb community spread of the virus. In order to assure equity of education, all families need to have internet access for delivery of instruction and communication with their teachers. The requested amount will provide hot spot for internet access for a 4-month period. Without internet access, the learning gap for student already living in poverty or struggling with special learning needs will likely increase.	14,000.00

**Total 14,000.00**

## 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 program proposed by USD 347 for Edwards County notes that the project timeline will run through December 31, 2020, however the close of the eligibility period for the CRF is December 30, 2020. The County should ensure that this expense responds 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

Edwards 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. 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. Edwards County Broadband

\$80,000  
Direct Aid

The expected completion date of this project is December 30, 2020, or the final day of the CRF eligibility period. The County should ensure that this expense responds 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.

## 3. Edwards County 800 mhz Radios

\$126,000  
Direct Aid

As this represents a significant purchase, the County should ensure that the proposed project is bid appropriately, meets uniform guidance standards outlined in 2CFR 200, is cost reasonable, and can be acquired prior to December 30, 2020.

## 4. Edwards County Bathroom Updates

\$63,374  
Direct Aid

This project notes that updates will be made to faucets, toilet, and paper towels somewhere in Edwards County with an expected completion date of December 30, 2020, or the final day of the CRF eligibility period. The County should ensure that this expense responds 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.

## 5. Edwards County Generator

\$23,760  
Direct Aid

This expenditure is described as needed to provide backup for the current 911 telephone system. The County should ensure that all costs are COVID-19 related and are incurred within the eligibility period.

## 6. Edwards County Sheriff Radio Upgrade

**\$35,478.74**  
Reimbursement

The County should ensure that this expense responds 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.

### **Spending Plan Request for Additional Information**

No additional information is requested at this time.

### **Modifications Required**

The following modifications are requested to the provided Reimbursement or Direct Aid plan in future reporting:

- For Direct Aid Plan, monthly expenditures reported in the summary page should be adjusted to align with dates provided in the tabs for planned independent expenditures/transfers/programs.

### **Conclusion**

1. Based on the documents provided by Edwards County, it appears they have a good understanding of the eligibility requirements relative to CARES Act funding and have appropriately followed this process.
2. Edwards County should provide modifications as outlined in this memo.
3. Edwards 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. The County should ensure that all expenses respond clearly to purpose and intent of CRF funding, meet all eligibility criteria and will be documented to the county file to support the expenses incurred before December 30, 2020.

Subject to considerations regarding payroll expenses, Edwards County may proceed with implementation of its CARES Act funding allocation as outlined in its provided reimbursement and direct aid plan.