

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

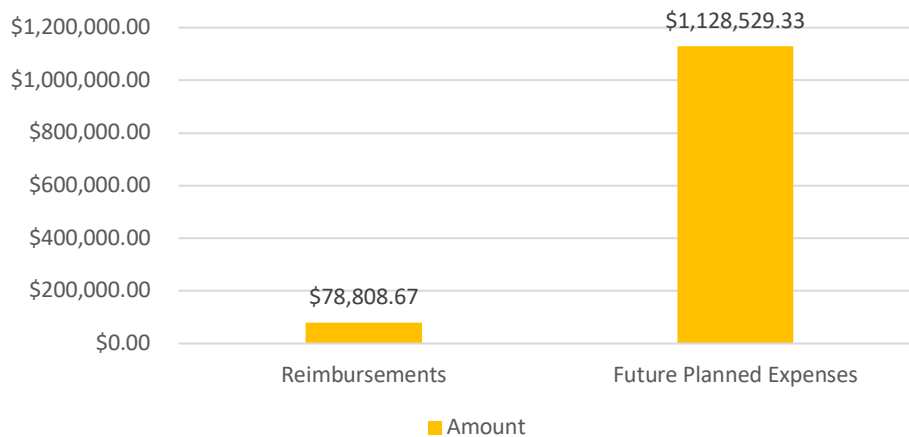
Date September 3, 2020
Re Review of Reimbursement and Direct Aid Spending Plan for Ellsworth County

General Information

Population: 6,102
 COVID-19 Cases 08/17/2020: 24

Total Allocation Amount: \$1,207,337.74
 Total Submitted for Reimbursement: \$78,808.67
 Total Submitted for Future Planned Expenditures: \$1,128,529.33

SPENDING PLAN OVERVIEW



Reimbursement Request Overview

Total Amount for County Expenditures: No Information Provided
 Total Amount for Subrecipients: \$62,488.03

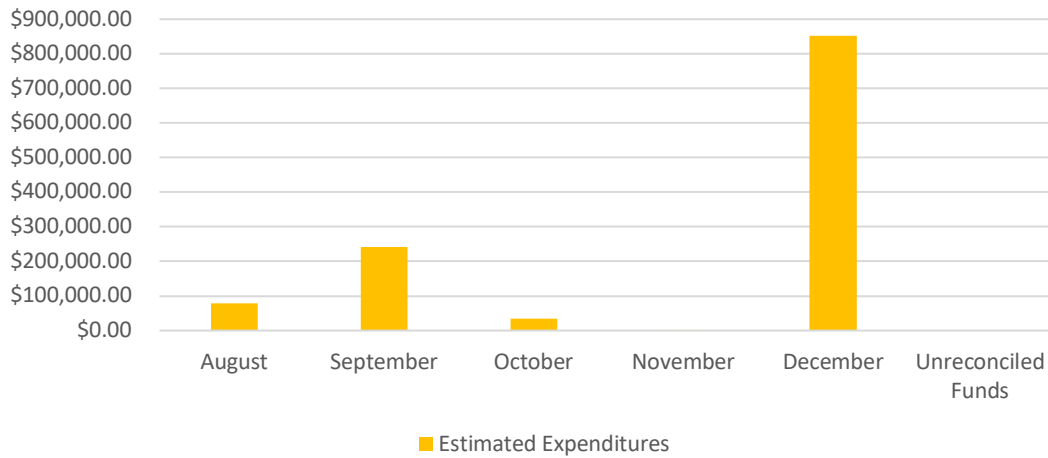
Subrecipients and Amounts

Subrecipient	Type	Amount
USD 112	Educational Institution(s)	\$5,771.56
USD 327	Educational Institution(s)	\$56,716.47
Total		\$62,488.03

Direct Aid Overview – Future Spending Plan

Total Amount for County Expenditures: \$211,031.40
 Total Amount for Transfers: \$2,497.46
 Total Amount for Programs: \$0

PROJECT SPEND DOWN RATE



County Expenditures

Subrecipient	Type	Amount
County Appraiser	County	\$30,932.00
District Court	County	\$1,465.80
Ellsworth County Conservation District	County	\$1,640.00
County Health Department	County	\$148,393.80
County Court	County	\$28,599.80
Total		\$211,031.40

Subrecipients/Transfers and Amounts

Subrecipient	Type	Amount
Central Kansas Mental Health Center	Non-profit	\$1,817.46
Midway Extension District - Ellsworth Office (KSU)	Higher Education	\$680.00
Total		\$2,497.46

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

Ellsworth County's direct aid documents state that \$915,000.47 of their funding allocation would be transferred to school districts, municipalities, nursing homes, and the County's Economic Development office. However, there are no supplemental documents outlining these transfers or the total planned transfers to each entity. Ellsworth County also has submitted for its own planned future expenditures as both individual programs and transfers for each office, but they have not been recorded as County expenditures in the summary of the Direct Aid Report.

Additionally, no information is supplied regarding the County's own reimbursements. However, the total value of the reimbursements for the two school districts do not match with the reimbursement total given in the County's documents, leaving \$16,320.64 unaccounted for in the reimbursements.

The County should ensure that all 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

Ellsworth County may benefit from additional technical expertise to assist them through the SPARK eligibility process.

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. Central Kansas Mental Health Center Telemedicine expenses

\$298.05
Direct Aid

The Central Kanas Mental Health Center (CKMHC) has purchased cell phone minutes, long distance service, and hot spot service in order to facilitate telehealth services. 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 expense incurred before December 30, 2020.

3. County Appraiser Vehicle

\$25,000
Direct Aid

This expenditure description states that purchasing a vehicle will allow the County Appraiser to conduct on-site visits when the office is closed to the public. While the proposed expense does help address adjustments to the general conduct of government, it is not immediately clear that the expense is necessary to address the public health emergency in the community. The County should consider a more short-term and/or cost reasonable option such as leasing a vehicle or utilizing another county fleet vehicle for this purpose. More information is requested to determine the necessity of the expense related to COVID-19.

4. County Appraiser Image Plotter

\$3,560.00
Direct Aid

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. County Health Department Building Renovations

\$123,168.80

Direct Aid

The County Health Department is seeking funds for construction projects related to the COVID-19 pandemic. These three projects include: restrooms with possible showers, dividing the health center to allow for quarantining as necessary, and a kitchen renovation to support food distribution for youth. The County should ensure that the proposed construction can be completed and/or costs will be incurred by December 30, 2020.

6. USD 327 Radio Commencement

\$200

Reimbursement

The school district is requesting a reimbursement for a remote commencement for the class of 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.

7. USD 327 Refunds for School Fees

\$265

Reimbursement

Although the proposed expense is relatively minor in value, the proposed expense appears to represent government revenue replacement. 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 on the above items is requested at this time.

Modifications Required

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

- All planned transfers and reimbursements should be detailed in individual tabs on the Direct Aid Plan.
- The totals on the summary pages of both the Reimbursement Report and the Direct Aid Plan should reconcile with detailed information provided on transfers and county expenditures.
- The timing for payments in the detailed tabs of the Direct Aid plan should substantiate the monthly expenditures data provided on the Summary Page of that report.
- The total value of the reimbursements for the two school districts must match with the reimbursement total. Currently, there is a discrepancy of \$16,320.64 which must be reconciled.
- The County should determine if each item in the Direct Aid plan is a transfer or a program and use the appropriate format provided for each.

Conclusion

1. Ellsworth County needs to submit a modified Reimbursement Report and a complete Direct Aid Spending Plan.
2. The proposed use of the total amount allocated to Ellsworth County has not been fully outlined in the provided Reimbursement Report and Direct Aid Plan. The State requires additional consultation with the County prior to its proposed use of funds received. A member of the Office of Recovery will be contacting you soon to discuss these considerations and outline next steps