

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

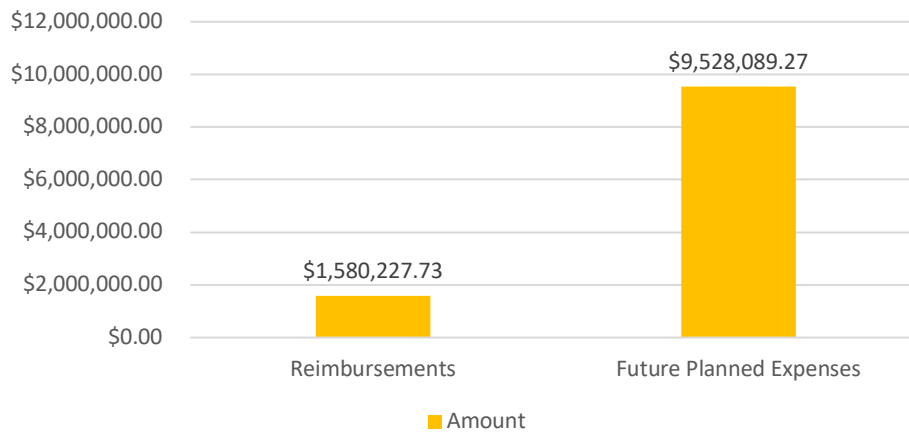
**Date** September 3, 2020  
**Re** Review of Reimbursement and Direct Aid Spending Plan for Ford County

**General Information**

Population: 33,619  
 COVID-19 Cases 08/17/2020: 2,241

Total Allocation Amount: \$11,108,317.43  
 Total Submitted for Reimbursement: \$1,580,227.73  
 Total Submitted for Future Planned Expenditures: \$9,528,089.27

**SPENDING PLAN OVERVIEW**



**Reimbursement Request Overview**

Total Amount for County Expenditures: \$394,120.78  
 Total Amount for Subrecipients: \$1,186,106.95

**Subrecipients and Amounts**

| Subrecipient                 | Type                         | Amount                |
|------------------------------|------------------------------|-----------------------|
| City of Dodge City           | City                         | \$822,185.90          |
| Dodge City Community College | Higher Education Institution | \$29,258.70           |
| USD 381                      | Educational Institution(s)   | \$154,926.35          |
| USD 443                      | Educational Institution(s)   | \$179,736.00          |
| <b>Total</b>                 |                              | <b>\$1,186,106.95</b> |

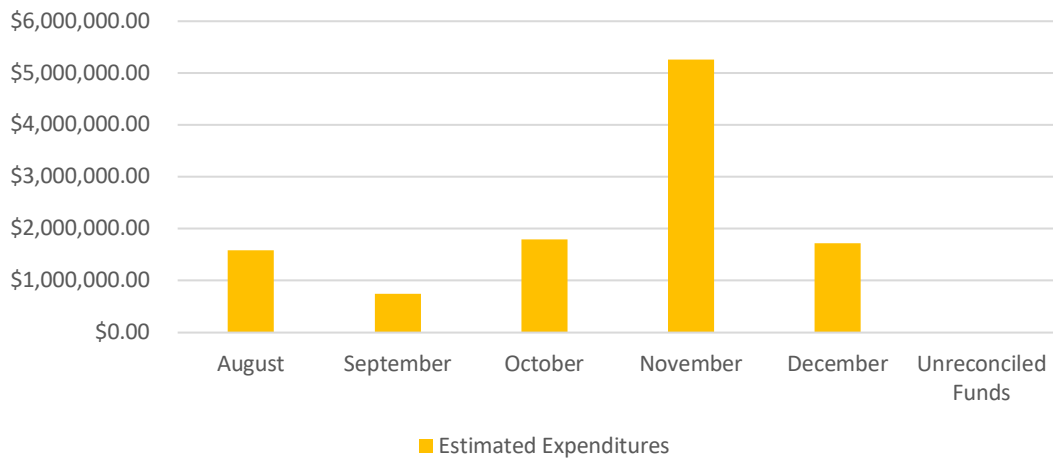
### Direct Aid Overview – Future Spending Plan

Total Amount for County Expenditures: \$3,637,553.74

Total Amount for Transfers: \$500,000.00

Total Amount for Programs: \$5,390,535.53

### PROJECT SPEND DOWN RATE



### Subrecipients/Transfers and Amounts

| Subrecipient                 | Type                         | Amount                |
|------------------------------|------------------------------|-----------------------|
| City of Bucklin              | City                         | \$249,147.50          |
| City of Dodge City           | City                         | \$1,238,678.10        |
| City of Ford                 | City                         | \$247,430.75          |
| Dodge City Community College | Higher Education Institution | \$989,941.53          |
| USD 381                      | Educational Institution(s)   | \$20,847.65           |
| USD 443                      | Educational Institution(s)   | \$2,520,264.00        |
| USD 459                      | Educational Institution(s)   | \$124,226.00          |
| <b>Total</b>                 |                              | <b>\$5,390,535.53</b> |

**Proposed Programs**

| Program Title  | Program Description  | Program Budget Amount |
|--|--|-----------------------|
| Ford County SPARKS Business and Not-for-Profit Grant Program | Small local businesses and not-for-profit organizations in Ford County have been negatively impacted by COVID-19. This includes loss of revenue from close downs for small businesses and lost fund raising for not-for-profit organizations. Additionally, the cost of providing services for these businesses and organizations has increased. | \$500,000.00          |
| <b>Total</b>   |  | <b>\$500,000.00</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**

Ford County has balanced its requests from subrecipients and its own expenditures. The majority of the funding allocation received by Ford County is expected to be used for future expenditures for both the County and multiple subrecipients. The majority of the future spending will be transfers to subrecipients; only one grant program is planning for Ford County.

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**

Ford 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.

However, two subrecipients are intending to construct buildings to better support their functions, which may be ineligible as the projects may not be completed at the closed of the CRF covered period and may not meet an appropriate standard of necessity tied to the public health crisis in the community.

**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 FFCRA 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. City of Ford Community Building

**\$245,353.76**

Direct Aid

The City of Ford is seeking funds to construct a new community building to support court and city administration functions. The current city building does not provide adequate space for social distancing, COVID-19 testing, or response. This appears to be a major construction project that may not be able to be completed within the required timeline to qualify for CRF. The County should ensure that the City has an adequate project management plan and approach to ensure the work will be substantially completed and all costs will be incurred prior to December 30, 2020. Additionally, the State discourages the purchase or construction of permanent capital assets unless the measure is the viable option to protect life and safety and/or address the immediate public health crisis in the community.

## 3. City of Bucklin Community Building

**\$249,147.50**

Direct Aid

The City of Bucklin is seeking funds to construct a new community building to support court and city administration functions. The current city building does not provide adequate space for social distancing, COVID-19 testing, or response. This appears to be a major construction project that may not be able to be completed within the required timeline to qualify for CRF. The County should ensure that the City has an adequate project management plan and approach to ensure the work will be substantially completed and all costs will be incurred prior to December 30, 2020. Additionally, the State discourages the purchase or construction of permanent capital assets unless the measure is the viable option to protect life and safety and/or address the immediate public health crisis in the community.

**4. Ford County Radio System**

\$2,304,602.00

Direct Aid

Ford County is seeking funds to install a new comprehensive and emergency communications system valued at over \$2 million. More information is needed to determine if this system can be purchased and installed within the eligibility period so as to be in compliance with the CRF guidance. More information should also be provided to indicate how this system is necessitated by the COVID-19 pandemic and to clarify that it was not included in a previous budget.

**Spending Plan Request for Additional Information**

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

| Item  | Recipient                  | Amount         | Comment  |
|---|----------------------------|----------------|--|
| <b>Cancelation of Conference because of stay at home orders</b> | Ford County Administration | \$1,301.06     | More detail on this project is requested to determine whether this reimbursement would classify as ineligible revenue replacement.   |
| <b>City of Ford Community Building</b>                          | City of Ford               | \$245,353.76   | More information is requested to indicate how construction of a new building is necessitated by the COVID-19 pandemic, and that the project can be substantially completed by December 30, 2020. |
| <b>City of Bucklin Community Building</b>                       | City of Bucklin            | \$249,147.50   | More information is requested to indicate how construction of a new building is necessitated by the COVID-19 pandemic, and that the project can be substantially completed by December 30, 2020. |
| <b>Ford County Radio System</b>                                 | Ford County                | \$2,304,602.00 | More information is requested to indicate how this system is necessitated by the COVID-19 pandemic, that it can be   |

procured prior to December 30,  
2020 and that it was not  
included in a previous budget.

### **Modifications Required**

No modifications required.

### **Conclusion**

1. Based on the documents provided by Ford County, it appears they have some understanding of the eligibility requirements relative to CARES Act funding and have generally followed the outlined process.
2. Ford County should provide responses to all requests for additional information outlined in this memo.

Subject to review of the additional documentation requested and considerations regarding payroll expenses, Ford County may proceed with implementation of its CARES Act funding allocation as outlined in its provided reimbursement and direct aid plan with the following exceptions:

- Ford County may not proceed with acquisition of the proposed radio system and construction of the new community buildings in the City of Bucklin and City of Ford until it has consulted further with the Office of Recovery.