

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

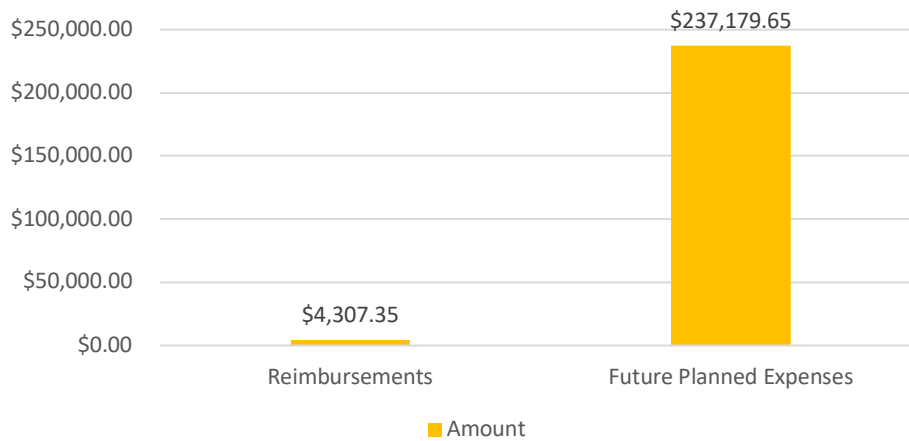
Date September 3, 2020
Re Review of Reimbursement and Direct Aid Spending Plan for Greeley County

General Information

Population: 1,232
 COVID-19 Cases 08/17/2020: 4

Total Allocation Amount: \$241,486.55
 Total Submitted for Reimbursement: \$4,307.35
 Total Submitted for Future Planned Expenditures: \$237,179.65

SPENDING PLAN OVERVIEW



Reimbursement Request Overview

Total Amount for County Expenditures: \$647.58
 Total Amount for Subrecipients: \$3,659.77

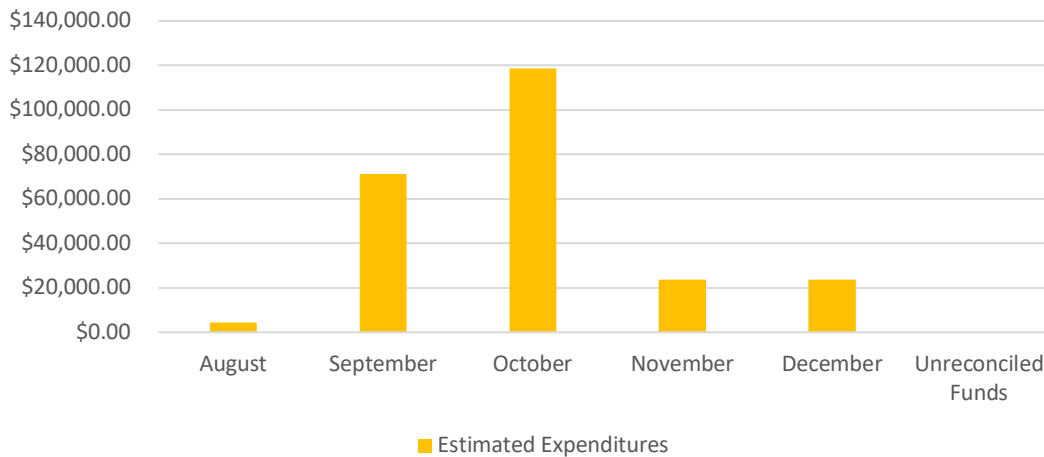
Subrecipients and Amounts

Subrecipient	Type	Amount
Crosswire Tire	Business	\$173.40
Moser Garage	Business	\$136.81
Moser Law Office	Business	\$737.79
Greeley County Extension Council	Community Organization	\$1,031.64
Greeley County Fair Association	Community Organization	\$1,311.45
Melvin Kuder Senior Center	Community Organization	\$180.22
Greeley County Library	Library	\$88.46
Total		\$3,659.77

Direct Aid Overview – Future Spending Plan

Total Amount for County Expenditures: \$198,179.65
 Total Amount for Transfers: \$0
 Total Amount for Programs: \$39,000.00

PROJECT SPEND DOWN RATE



Proposed Programs

Program Title	Program Description	Program Budget Amount
Non-Profit Grant Program	<p>Provide grant assistance to the community through community food banks, religious organizations and non-profits.</p> <p>Non-profit organizations play a vital role in the county to equitably distribute resources to underserved and at-risk populations. Their ability to serve has been limited by mandatory closures and state-wide stay-at-home orders. They have also incurred additional costs to adhere to proper social-distancing and sanitation standards that were not budgeted for prior to the pandemic. Through this grant program, funds will be utilized to assist them in their mission to support the communities they serve. Program development in August. Funding will be made available until the earlier of when funds are depleted or December 30, 2020.</p>	\$39,000.00
Total		\$39,000.00

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

Greeley County is prioritizing future planned expenses over reimbursements, with the majority of the direct aid funds remaining with the County itself. Only one program is proposed for use of direct aid funds and no subrecipients are listed. For the reimbursement expenditures, the majority of the funding appears to be designated for subrecipients, although all of the expenditures are included as if they were directly from the County itself.

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

Greeley County and its subrecipients have a fair understanding of CRF eligibility. However, one of the expenditures for direct aid is listed as part of costs to Greeley County, but would be better reflected as a transfer to USD 200, the receiving entity, as the items are described as disinfecting supplies, temperature scanners, and other supplies to aid in school reopening. Greeley County may benefit from technical expertise in navigating the SPARK 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. Area Businesses Reimbursement

\$1,048.00

Reimbursement

Greeley County has indicated that they have made direct payments to area businesses to reimburse costs for PPE, shields, etc. It is not clear what the process was for businesses to request and then receive approval for these funds. More information is requested from the County. Should the county choose to continue participating in direct payments to area businesses a formal grant program with an application process and review committee is recommended.

3. Lab COVID Analyzer for County Health Services

\$112,692.65

Direct Aid

This expenditure is the single largest purchase with Greeley County's funding allocation and does have a direct nexus to the COVID-19 pandemic. However, the County should ensure that this cost can be incurred within the CRF eligibility period.

The CRF guidance states, "Finally, the CARES Act provides that payments from the Fund may only be used to cover costs that were incurred during the period that begins on March 1, 2020, and ends on December 30, 2020 (the "covered period")."

The most recent update (6/30/2020) to the CRF guidance clarifies that "for a cost to be considered to have been incurred, performance or delivery must occur during the covered period but payment of funds need not be made during that time (though it is generally expected that this will take place within 90 days of a cost being incurred)."

4. Non-Profit Grant Program

\$39,000



Laura Kelly, Governor

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.

Spending Plan Request for Additional Information

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

Item	Recipient	Amount	Comment
Non-Profit Grant Program	Unified Greeley County	\$39,000.00	Additional information is requested on how applicants will apply and be selected, and who will be administering the proposed program.
Area Businesses Reimbursement	Crosswire Tire, Moser Garage, Moser Law Firm	\$1,048.00	More information is needed to determine how these businesses were chosen for direct reimbursement.

Modifications Required

Greeley County should adjust their direct aid to reflect a direct transfer of \$20,872.65 to the subrecipient USD 200, an educational institution, for COVID-19 related expenses.

Conclusion

1. Based on the documents provided by Greeley County, it appears they have a good understanding of the eligibility requirements relative to CARES Act funding and have appropriately followed this process.
2. Greeley County should provide modifications and responses to all requests for additional information outlined in this memo.
3. For the Non-Profit Grant Program, if not already in place, Greeley 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.
4. Greeley County has proposed many potential subrecipient arrangements. The County should ensure they have the appropriate level of administrative capacity to effectively monitor these subrecipients.

Subject to review of the additional documentation requested, making the modification(s) listed above, and considerations regarding payroll expenses, Greeley County may proceed with implementation of its CARES Act funding allocation as outlined in its provided reimbursement and direct aid plan.