

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

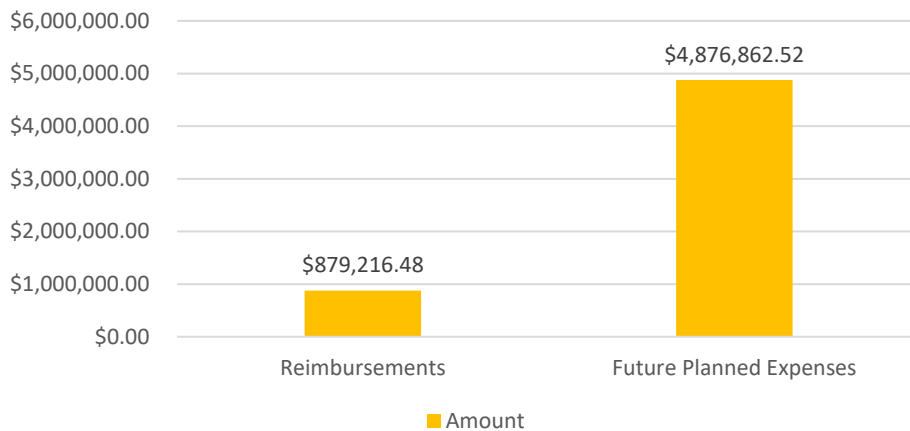
Date September 11, 2020
Re Review of Reimbursement and Direct Aid Spending Plan for McPherson County

General Information

Population: 28,542
 COVID-19 Cases 08/17/2020: 178

Total Allocation Amount: \$5,756,079.43
 Total Submitted for Reimbursement: \$879,216.48
 Total Submitted for Future Planned Expenditures: \$4,876,862.52

SPENDING PLAN OVERVIEW



Reimbursement Request Overview

Total Amount for County Expenditures: \$185,376.11
 Total Amount for Subrecipients: \$693,840.37

Subrecipients and Amounts

Subrecipient	Type	Amount
USD 418	Educational Institution	\$55,044.32
USD 419	Educational Institution	\$9,763.57
USD 423	Educational Institution	\$43,136.00
USD 448	Educational Institution	\$25,314.62
City of McPherson	City	\$172,338.00
City of Marquette	City	\$5,220.76
City of Lindsborg	City	\$112,110.36
Pine Village LTC	Health Service	\$5,566.25
McPherson College	Higher Education Institution	\$74,638.53
MCDS	Disability Care & Service	\$33,600.00

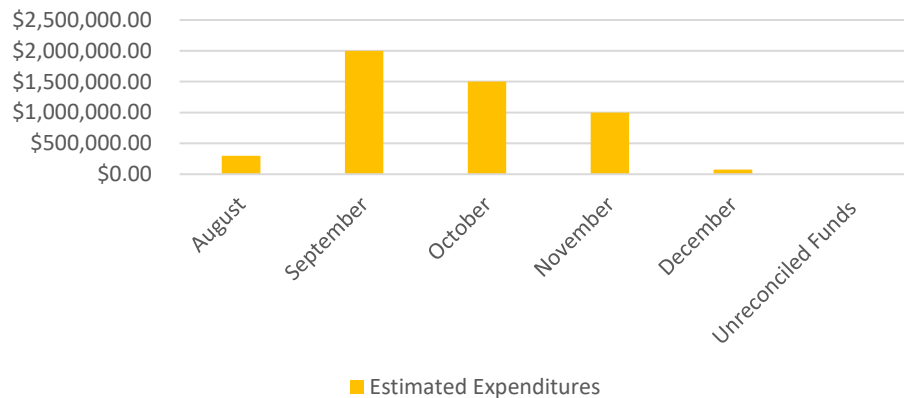
Elyria Christian School	Educational Institution	\$18,999.43
DSGP	Disability Care & Service	\$47,962.25
Bluestem Pace	Health Service	\$5,565.36
Marquette Learning Center	Early Education Institution	\$7,430.39
City of Moundridge	City	\$18,510.41
Moundridge Manor	Health Service	\$58,640.12
Total		\$693,840.37

Direct Aid Overview – Future Spending Plan

Total Amount for County Expenditures: \$583,427.88

Total Amount for Programs and Transfers: \$4,293,434.64

PROJECT SPEND DOWN RATE



Subrecipients/Transfers and Amounts

Subrecipient	Type	Amount
Canton Township Library	Library	\$1,200.00
City of Lindsborg	City	\$70,000.00
Sprout House Learning Center	Non-Profit Organization	\$50,000.00
USD 400	Educational Institution	\$421,600.00
USD 419	Educational Institution	\$122,636.43
USD 423	Educational Institution	\$116,864.00
USD 418	Educational Institution	\$291,016.20
USD 418	Educational Institution	\$304,635.10
USD 418	Educational Institution	\$80,594.85
USD 418	Educational Institution	\$44,200.00
USD 418	Educational Institution	\$183,625.00
USD 418	Educational Institution	\$50,084.53
Total		\$1,736,456.11

Proposed Programs

Program Title	Program Description	Program Budget Amount
Distance Learning	In order to accommodate students/teachers/classrooms that will need to distance learn due to COVID-19 sickness or quarantine, St. Joseph Catholic School must have the technology needed to do so for every student and teacher. With a small teaching staff, teachers will need to be able to provide both classroom and online opportunities simultaneously.	\$52,481.00
Student PPE	In order to comply with the safe school measures needed, St. Joseph Catholic School will need additional PPE and cleaning materials.	\$2,719.00
Information System	Disability Supports of the Great Plains' employees realize that tools once used to communicate are no longer adequate to meet the ever-changing needs of our population during the COVID-19 Pandemic. Efficient internal communication is a must to effectively meet the critical needs of those we serve.	\$10,000.00
Safety Measures	There continues to be a need for PPE, as well as disinfecting/sanitizing supplies, to keep Disability Supports of the Great Plains' clients healthy.	\$15,837.75
Bluestem PACE Remote Technology Program	To purchase and deploy additional telehealth enabled technology to promote the health and well-being of nursing home eligible PACE participants, ages 55+, living in the community. Technology is a critical resource during this pandemic to address many unintended consequences associated with social distancing and isolation.	\$23,302.30
Bluestem PACE COVID-19 Staffing Support Program	Increase support staff to provide in home socialization for Bluestem PACE participants (spending 2-4 hours per week with face to face interaction in participants home to engage them socially and reduce isolation). This could be a Social Worker in addition to a Certified Nurse Assistant who would be embedded in the care management team.	\$27,550.00
Install IT equipment and internet at the city council room	A TV, small computer, video recorder, and speakers will be installed in the Inman City's city council room for purposes of remote training of staff and remote council meetings.	\$7,000.00
Police Department locked containers for PPE supplies	Purchase two locked metal cabinets for PPE supplies.	\$700.00
Place zoning records online	Place the zoning and subdivision regulations on the city website to allow the public to access records online.	\$1,500.00
Protective and disinfecting supplies	Masks, disposable gloves, filters, and cleaning and disinfecting supplies are needed by the staff of all the city departments and for the community building.	\$3,000.00

Local Small Business Public Health Grant Program	Pleasant View Home, a retirement community in Inman, KS has been negatively impacted by the pandemic caused by COVID=19 as we are required to take extra precautions to protect our residents. The purchase of additional PPE, employee screening, establishment of COVID wards and facilitating telemedicine are among the needs that have occurred.	\$66,495.81
Expansion of Resident Care Assistant Program	Maintain coverage of 40 hours/day for RCA positions; RCAs are tasked with cleaning, front door monitoring due to visitor restrictions, one on one activities with residents, delivering room trays to residents, etc.	\$46,505.00
Reopening School	Elyria Christian School has been significantly impacted by COVID-19 and will need additional resources to re-open. We propose funding for the following expenses.	\$33,468.00
Reopening School	Elyria Christian School has been significantly impacted by COVID-19 and will need additional resources to re-open. We propose funding for the following expenses.	\$24,732.57
City of McPherson, KS Emergency Operations Center (EOC) Planning and Coordination Efforts	EOC Meetings & Other EOC Administrative Activities such as EOC Briefings, EOC Operations Planning, EOC Development of Actions, Strategies & Tactics.	\$39,264.45
City of McPherson, KS Staffing Backfill Costs or Hazard Pay	Personnel Costs such as overtime to cover Emergency Responders staff out on COVID quarantine leave or Coverage for Staffing due to COVID-19 runs based off of 911/Emergency Medical calls.	\$7,807.72
City of McPherson, KS Emergency Operations Center (EOC) Operations Related to City Facilities and Assets mitigating COVID-19	Expenses for Cleaning & Sanitizing City Assets & Facilities such as Parks, Golf Course, Water Park, Shop Facilities as well as running the Decontamination System for all City of McPherson facilities and assets & any City COVID-19 Cluster Sites.	\$58,569.37
City of McPherson, KS Emergency Operations Center (EOC) Communications of COVID-19 policy and updates to the public	Implementing social distancing, quarantine, shelter-in-place and self-isolation measures by provided communications and News Releases to the Public via the City's website, City's COVID-19 hub site, social media, the press & internet.	\$13,247.04
City of McPherson, KS Legal Services in support of COVID-19	Contracted legal services by City Attorney in support of COVID-19 meetings, policy interpretation, guidance & development, legal research, legal support of the EOC, etc.	\$7,895.31
City of McPherson, KS support of Families First Coronavirus Response Act	Effective 4/1/2020. U.S. Department of Labor announced new action regarding the Emergency Paid Sick Leave Act & Emergency Family and Medical Leave Expansion Act requiring payment to employees in these categories related to COVID-19.	\$36,770.73

<p>City of McPherson, KS involvement with the Farm to Family Food Donation Program</p>	<p>City coordination and assistance with the weekly Farm to Family Food Donation Program.</p>	<p>\$1,846.37</p>
<p>City of McPherson, KS Crossing Guard Modified Program for Fall 2020</p>	<p>Personnel Costs for Crossing Guards and their supervision to cover the additional hours required due to the School District 418's Hybrid Learning Model which arranges the school day in "half-day" settings. This requires double the hourly coverage of the crossing guards per day.</p>	<p>\$10,260.00</p>
<p>Basic PPE for Emergency Responders in Treating and Responding to COVID-19 Patients</p>	<p>With a significant amount of PPE and other medical equipment has been very difficult to obtain and having high burn rates throughout the pandemic. It is critical that available stock of essential PPE be available to protect emergency responders who are going into often unknown situations. Expected PPE will include: 37 Innotex Level 3 Medical Coveralls various sizes \$9,876.00; 72 boxes of Nitrile Black Medical exam gloves \$15,048; 2000 3M N100 disposable masks - \$18,720; 2000 Medline Safety Glasses \$19,335; 2000 Medline Face Shields - \$5,982.00; Critical Basic Medical Supplies for treating COVID-19 - \$28,644.73; 5 Airway Suction Units \$3,015.00; 6 PAPR unites with 3 cases of filters \$10,959.72.</p>	<p>\$111,580.45</p>
<p>Lifepak Monitor/Defibrillators-Critical Emergency Response Technology for Treatment and Responding Appropriately to COVID-19 Patients</p>	<p>This includes purchase 15 Lifepak v4 Monitors which will be utilized throughout all emergency medical, rescue and emergency hazardous material incidents. Functions of this equipment includes but is not limited to, SpO2 monitoring, temperature monitoring, waveform capnography, EtCO2 monitoring, blood pressure monitoring, and ECG monitoring. Because of COVID-19 patents requiring emergency treatment and having the ability to assist those patients with this technology, this equipment is essential.</p>	<p>\$69,004.00</p>
<p>CAD Monitoring - Critical Emergency Response Technology for Responding Appropriately to COVID-19 Patients</p>	<p>This includes establishment of a CAD Dispatch interface Surface Pro 7 Tablets, and Tablet Mounts for Fire Department Vehicles. This is critical in COVID-19 Response as currently fire personnel do not receive live CAD from Dispatch for Signal 19 (COVID-19) patients. Tablets Interfacing with Dispatch CAD are vital to inform responders for safety and resources for safety and resource allocation for the given incident. Dispatch information that allows personnel to access the chief complaint or nature of the call for service.</p>	<p>\$39,131.96</p>

<p>City of McPherson, KS involvement with the Farm to Family Food Donation Program</p>	<p>Purchase of an enhanced audio-visual equipment for streaming public meetings which has limited allowed attendance. For nearly two years McPherson has streamed Commission Meetings live but challenges exist in getting out clear communication with antiquated audio-visual equipment. Funds would all upgrade improve clarity when have public meeting critical for communicating our meetings and messages related to COVID-19. This renovation will allow the city to stream all public meetings when attending meetings in person is difficult and causes a safety concern for interested citizens, city staff, elected officials, outside presenters.</p>	<p>\$40,000.00</p>
<p>Critical PPE and Disinfectant Supplies for Law Enforcement</p>	<p>Law Enforcement PPE and Disinfection Materials. PPE is used by law enforcement while responding to public safety needs in the community. With so much unknown about the public they come into contact with this need is absolutely critical. Disinfecting both vehicles and workspaces is absolutely critical to insuring the health of safety of both individual officers and overall department.</p>	<p>\$6,480.00</p>
<p>Technology for Remote Meeting and Work Communication for Essential Employee Workers</p>	<p>Purchase of remote technology for employees required to work from home as a result of a cluster outbreak, sickness or required quarantine or split shift work arrangements. Also, current technology makes ready communication difficult for remote meetings. Adding web cameras microphones to existing PCs is critical to improve remote communication for Zoom/GoToMeeting technology. Some portable equipment for copying and scanning will also be critical. Working remotely requires many employees to obtain internet capable to work from a home setting.</p>	<p>\$49,150.00</p>
<p>Municipal Court Office Area Expansion</p>	<p>Expansion of the current office space to allow for social distancing. The current space is extremely small and the two employees are not able to be six feet apart from each other. With this being a two person office it is critical for them to be able to social distance and stay healthy. If both of these employees got sick we would not be able to hold our municipal court, and run our court services for the City. This project would just be a current expansion of the existing office and would be adding three new walls and windows. This includes moving wall, lighting, electrical, HVAC. We are working with Hutton Construction to get an exact plan for construction.</p>	<p>\$22,000.00</p>
<p>Readying Bethany College for Students on Campus</p>	<p>The scope of the project is to ensure Bethany College is prepared for the return of our students during the Covid-19 pandemic and to ensure the students have a safe and productive fall semester. Our institution will need additional PPE, additional services and equipment to ensure the safety of both the students, faculty, staff and the citizens of Lindsborg KS. All of these expenses are directly related to Covid-19 and our efforts to ensure the safety everyone involved.</p>	<p>\$250,000.00</p>

Distance Learning Mitigation Plan	Installation of needed technology to provide Hy-Flex instruction on campus. A Hy-Flex infrastructure will allow the campus to maximize course interaction, providing continued employment to the faculty 7 staff, as well as diminishing the disruption of degree attainment for student enrolled at the College. The scope of the program includes the installation of a camera, microphone, and cable to allow for remote access to selected classrooms. Preliminary work is underway. However, limited funding has restricted the capacity to meet current need.	\$74,342.00
Public Health Expenses	In alignment with County, State, and Federal guidelines, the College seeks to expand current mitigation protocols to moderate spread. Some items are needed to aid reopening strategies, while others represent possible mitigation protocols that would need funding if a community spread required direct action.	\$175,658.00
PPE supplies purchase	Program is to purchase additional PPE supplies when and where available.	\$10,000.00
Remote work capability enhancements due to COVID 19	Technology to allow for telework and remote learning/meeting due to the COVID 19 crisis.	\$53,000.00
McPherson Recreation Commission COVID Expense Grant Project	To provide a safe environment for participants, patrons and the public during indoor and outdoor sports and activities, and while visiting facilities we maintain, MRC needs to provide essential PPE by purchasing sanitizers, cleaners and equipment, and hiring personnel to perform cleaning functions.	\$13,047.05
Riverview Estates updated Remote Work Capabilities	This would allow staff to effectively work from home to help reduce COVID-19 exposure to our residents.	\$22,219.56
SPARK/CARE Funding Program	This program is reimbursing school staff for the purchase of Personal Protection Equipment for them to use during school hours.	\$4,500.00
SPARK/CARE Funding Program	This program is for contracting additional nursing services to help with students and staff dealing with health issues.	\$15,000.00
SPARK/CARE Funding Program	This program is for contracting additional custodial and cleaning staff.	\$18,000.00
SPARK/CARE Funding Program	This program is for hiring a full-time substitute teacher to provide additional staff and student support.	\$16,605.00
SPARK/CARE Funding Program	This program is for contracting for an On-Line Curriculum for students.	\$9,000.00
SPARK/CARE Funding Program	This program is for the financial compensation of extra contract days worked by all teachers.	\$45,022.00
SPARK/CARE Funding Program	This program is for the purchase of additional tables and chairs for the school lunch program.	\$2,830.38
SPARK/CARE Funding Program	This program is for the purchase of an Electrostatic Disinfecting Machine.	\$4,125.00
SPARK/CARE Funding Program	This program is for the purchase of "Gaiter" type face masks for all students.	\$3,630.00
SPARK/CARE Funding Program	This program is for the purchase of four Touchless Drinking Fountains.	\$7,300.00

SPARK/CARE Funding Program	This program is for the purchase of two MacBook Pro Laptops.	\$4,798.00
SPARK/CARE Funding Program	This program is for the purchase of materials to install, construct and modify school facilities.	\$3,875.00
Food Storage and Processing Capacity	Increase the processing and storage capacity two animal processing facilities and County Food Bank. With the reduction in processing in large animal processing and packing plants, due to COVID 19) the smaller processing plants can increase processing provided cooling and storage capacity in increased.	\$35,000.00
PPE	With availability and cost of PPE this program would serve the schools, businesses, industry, governmental and non-profit needing PPE supplies. PPE would include masks, gloves, face shields, protective gowns, hand sanitizers, etc. at no cost. This is an expense operating cost for many small businesses and non-profits.	\$75,000.00
Loss of Income and/or contributions	Program would provide Grants to for profit businesses that were required to close by State order or voluntarily closed due to COVID 19. Program would also provide Grant funding to non-profits that loss income due to cancellation of programs, fund raising events and reduced donations as a result of COVID 19.	\$500,000.00
Rent and Utility Subsidy	Provide rental assistance to include utility assistance to citizens living in the County per Program guidelines.	\$88,000.00
Childcare needs in the County	Study the needs of available childcare facilities in the County.	\$50,000.00
Expand Dining Room for students at McPherson College	This program expands physical distancing of McPherson College students at meal times into the basement of the student union. This will provide additional distancing to slow down the spread of the virus. The grant will be used to pay the additional fees to our food service provider for additional labor and hardware/equipment needed to open this space up for student dining and take out.	\$40,000.00
COVID testing of students, faculty and staff	Purchase of COVID tests for school year for students, faculty and staff of McPherson College.	\$113,011.47
Personal Protective Equipment (PPE)	This program pays for Personal Protective Equipment (PPE) which includes masks (cloth and disposable), hand sanitizer, wipes, face shields, sneeze shields and sneeze guards for McPherson College students, faculty and staff.	\$22,350.00
McPherson Family YMCA COVID Expenses Grant Project	To improve the health of our members and the public we need to provide proper PPE for members and staff and hire extra staff to sanitize and clean and purchase extra sanitizer and cleaner for the facility.	\$63,317.28
Safe Reopening of Pine Village	To maintain safety for our elderly residents as we re-open the facility. To continue to try to keep COVID out of our facility while allowing them to return to a better quality of life.	\$9,048.96
	Total	\$2,556,978.53

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

McPherson County has prioritized its reimbursement requests for subrecipients. Total County reimbursements equal 21.08% of all expenditures, while subrecipients request total 78.92% of the \$879,216.48 submitted for reimbursement review. In particular, cities comprised a significant portion of subrecipient requests at 44.42% of the total \$693,840.37 submitted for reimbursement by subrecipients.

McPherson County's substantially larger direct aid request prioritizes program expenditures, which amounts to 52.43% of the \$4,876,862.52 for direct aid review. As mentioned later in this report's Identified Compliance Considerations section, various programs appear to be better suited and classified as transfers, which may alter the direct aid plan's proportional values. The County only accounts for 11.96% of direct aid requests, which demonstrates a decrease from its request total submitted for reimbursement review.

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.

Technical Understanding of SPARK Process

McPherson County and its subrecipients may benefit from additional technical expertise in navigating the SPARK eligibility process. Many of the proposals submitted as programs would be better reflected as transfers, and several transfer proposals are better reflected as programs. Our identified risks and compliance considerations for these are outlined below.

Identified Compliance Considerations

1. Payroll Expenses

The matter of reimbursement for previously budgeted but substantially dedicated public safety, public health and human services 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. To mitigate the risk of potential financial modifications should the Treasury's guidance present more restrictive criteria than currently outlined, the Office of Recovery has determined that the County should only proceed with reimbursing the following payroll expenses:

- 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).

- 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 personnel and services that are considered substantially dedicated to preparing for, mitigating against or responding to COVID-19, and whose actions can be clearly documented. The County should also ensure that all payroll records reflect this commitment of time and the tasks performed and/or responsibilities related to COVID-19 are clearly noted in documents supporting the expense.

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 expenses are compliant to the OIG Guidance.

2. Classification of Programs and Transfers

Direct Aid

The following programs/projects appear to be better suited as transfers.

Organization	Program Name	Amount
St. Joseph Catholic School	Distance Learning	\$52,481.00
St. Joseph Catholic School	Student PPE	\$2,719.00
Disability Supports of the Great Plains, Inc.	Information System	\$10,000.00
Disability Supports of the Great Plains, Inc.	Safety Measures	\$15,837.75
Bluestem PACE, Inc.	Bluestem PACE Remote Technology Program	\$23,302.30
Bluestem PACE, Inc.	Bluestem PACE COVID-19 Staffing Support Program	\$27,550.00
City of Inman	Install IT equipment and internet at the city council room	\$7,000.00
City of Inman	Police Department locked containers for PPE supplies	\$700.00
City of Inman	Place zoning records online	\$1,500.00
City of Inman	Protective and disinfecting supplies	\$3,000.00
Bethany Home Association	Expansion of Resident Care Assistant Program	\$46,505.00
Elyria Christian School	Reopening School	\$33,468.00
Elyria Christian School	Reopening School	\$24,732.57
City of McPherson	City of McPherson, KS Emergency Operations Center (EOC) Planning and Coordination Efforts	\$39,264.45
City of McPherson	City of McPherson, KS Staffing Backfill Costs or Hazard Pay	\$7,807.72
City of McPherson	City of McPherson, KS Emergency Operations Center (EOC) Operations Related to City Facilities and Assets mitigating COVID-19	\$58,569.37

City of McPherson	City of McPherson, KS Emergency Operations Center (EOC) Communications of COVID-19 policy and updates to the public	\$13,247.04
City of McPherson	City of McPherson, KS Legal Services in support of COVID-19	\$7,895.31
City of McPherson	City of McPherson, KS support of Families First Coronavirus Response Act	\$36,770.73
City of McPherson	City of McPherson, KS involvement with the Farm to Family Food Donation Program	\$1,846.37
City of McPherson	City of McPherson, KS Crossing Guard Modified Program for Fall 2020	\$10,260.00
City of McPherson	Basic PPE for Emergency Responders in Treating and Responding to COVID-19 Patients	\$111,580.45
City of McPherson	Municipal Court Office Area Expansion	\$22,000.00
Bethany College	Readying Bethany College for Students on Campus	\$250,000.00
Central Christian College of Kansas	Distance Learning Mitigation Plan	\$74,342.00
Central Christian College of Kansas	Public Health Expenses	\$175,658.00
Multi Community Diversified Services, Inc.	PPE supplies purchase	\$10,000.00
Multi Community Diversified Services, Inc.	Remote work capability enhancements due to COVID 19	\$53,000.00
McPherson Recreation Commission	McPherson Recreation Commission COVID Expense Grant Project	\$13,047.05
Riverview Estates	Riverview Estates updated Remote Work Capabilities	\$22,219.56
Inman USD No 448	SPARK/CARE Funding Program	\$4,500.00
Inman USD No 448	SPARK/CARE Funding Program	\$15,000.00
Inman USD No 448	SPARK/CARE Funding Program	\$18,000.00
Inman USD No 448	SPARK/CARE Funding Program	\$16,605.00
Inman USD No 448	SPARK/CARE Funding Program	\$9,000.00
Inman USD No 448	SPARK/CARE Funding Program	\$45,022.00
Inman USD No 448	SPARK/CARE Funding Program	\$2,830.38
Inman USD No 448	SPARK/CARE Funding Program	\$4,125.00
Inman USD No 448	SPARK/CARE Funding Program	\$3,630.00
Inman USD No 448	SPARK/CARE Funding Program	\$7,300.00
Inman USD No 448	SPARK/CARE Funding Program	\$4,798.00
Inman USD No 448	SPARK/CARE Funding Program	\$3,875.00
McPherson College	Expand Dining Room for students at McPherson College	\$40,000.00
McPherson College	COVID testing of students, faculty and staff	\$113,011.47
McPherson College	Personal Protective Equipment (PPE)	\$22,350.00
McPherson Family YMCA	McPherson Family YMCA COVID Expenses Grant Project	\$63,317.28
Pine Village	Safe Reopening of Pine Village	\$9,048.96
	Total	\$1,605,212.57

3. Gift Cards for Food Service Employees

Reimbursement
 \$1,566.60

USD 418 expenditures for gift cards to food service employees but does not include additional detail on what the gift cards can be utilized for. Gift cards for personnel may be considered a workforce bonus if an intended use of funds is not clearly outlined. Current guidance states that workforce bonuses other than hazard pay or overtime are “costs that would *not* be eligible expenditures of payments from the Fund.”

4. County Commission Room Relocation, Construction, and Improvements

Direct Aid
 \$109,214.00

The County submitted two CRF requests for \$65,000.00 and \$44,214.00 to use towards relocating, constructing, and updating the physical layout of its commission room to allow for proper social distancing. As this represents a capital improvement, 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 substantially completed prior to December 30, 2020.

5. Municipal Court Office Area Expansion

Direct Aid
 \$22,000.00

The City of McPherson submitted a CRF request for \$22,000.00 to use towards the expansion of its Municipal Court office area to allow for social distancing. As this represents a construction project, 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 substantially completed prior to December 30, 2020.

6. Economic/Financial Support Programs

Direct Aid
 \$638,000.00

The following programs reflect planned expenditures in the form of economic support by McPherson County:

Organization	Program Name	Amount
McPherson County	Loss of Income and/or contributions	\$500,000.00
McPherson County	Rent and Utility Subsidy	\$88,000.00
McPherson County	Childcare needs in the County	\$50,000.00

As these are identified as grant or, in the broader category, economic/financial support programs to be distributed by McPherson County, the County should have a well-qualified plan for how applicants will apply and be selected. Additionally, the County should ensure they have the appropriate level of administrative capacity to effectively administer the programs and/or monitor any 3rd party entity responsible for administering the programs.

7. Sprout House Building Planning Transfer

Direct Aid
\$50,000.00

Sprout House Learning Center submitted a CRF request for \$50,000.00 to use towards their payment to architect for building a sanitary childcare center with the room to allow for social distancing. It is not immediately clear when the associated project will be completed and may produce compliance concerns if the project is not substantially completed prior to December 30, 2020.

8. Program/Transfer Timelines

Direct Aid

The transfer titled City of Lindsborg Public Health Response does not have appended timeline information in its description. The County should ensure that the proposed transfer will incur the use of CRF funds prior to December 30, 2020.

The following programs/transfers were described with a timeline expectation that exceeds the CRF eligibility period by one day. Specifically, each of these programs were inputted with a date that ends on December 31, 2020. Notably, the City of McPherson has 11 programs with the respective timeline identified as December 31, 2020. Since use of CRF funds must be incurred prior to December 30, 2020, the County should ensure it has appropriate processes in place to ensure proper use of funds through the eligibility period under CRF guidance:

Organization	Direct Aid Type	Program/Transfer Name
St. Joseph Catholic School	Program	Distance Learning
St. Joseph Catholic School	Program	Student PPE
Pleasant View Home	Program	Local Small Business Public Health Grant Program
Elyria Christian School	Program	Reopening School
Elyria Christian School	Program	Reopening School
Central Christian College of Kansas	Program	Public Health Expenses
City of McPherson	Program	City of McPherson, KS Emergency Operations Center (EOC) Planning and Coordination Efforts
City of McPherson	Program	City of McPherson, KS Staffing Backfill Costs or Hazard Pay
City of McPherson	Program	City of McPherson, KS Emergency Operations Center (EOC) Operations Related to City Facilities and Assets mitigating COVID-19
City of McPherson	Program	City of McPherson, KS Legal Services in support of COVID-19
City of McPherson	Program	City of McPherson, KS support of Families First Coronavirus Response Act
City of McPherson	Program	City of McPherson, KS Crossing Guard Modified Program for Fall 2020
City of McPherson	Program	Basic PPE for Emergency Responders in Treating and Responding to COVID-19 Patients

City of McPherson	Program	Lifepak Monitor/defibrillator- Critical Emergency Response Technology for Treatment and Responding Appropriately to COVID-19 Patients
City of McPherson	Program	CAD Monitoring - Critical Emergency Response Technology for Responding Appropriately to COVID-19 Patients
City of McPherson	Program	Technology for Remote Meeting and Work Communication for Essential Employee Workers
City of McPherson	Program	Municipal Court Office Area Expansion
USD 419	Transfer	*No title provided.

**Transfer purpose and description: Expenses associated with re-opening schools and preparing for distance learning.*

Spending Plan Request for Additional Information

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

Item	Recipient	Amount	Comment
Gift Cards for Food Service Employees	McPherson County	\$1,566.60	More information is requested to determine what the gift cards provided were for and if they represent a workforce bonus

Modifications Required

The following modifications are requested in future reporting:

1. In the direct aid plan summary, correct the total allocation amount and change it to \$5,756,079.43. It appears that the total future planned expenditures were incorrectly inputted as the total allocation amount by mistake.
2. The direct aid plan's totaling tool should be corrected through a consolidation of multiple transfers for the same entity as one transfer. In addition, the total amount of programs in the County's second program file is inputted to add up to 16 rather than 26.
3. In the direct aid plan, there appears to be a few programs with no variation in their titles despite having different expenditure details. It is suggested that future projects/programs have a different title.
4. In the Direct Aid Plan, change the programs totaling **\$1,605,212.57** delineated above to direct transfers in future reporting.

Conclusion

1. Based on the documents provided, McPherson County does have a generally adequate understanding of eligible use of CRF proceeds. However, many items outlined in their spending plan have been identified as compliance concerns.
2. McPherson County has an appropriate Project Spend Down Rate in accordance with program guidelines and eligibility
3. McPherson County has proposed many potential subrecipient arrangements. The County should ensure they have the appropriate level of administrative capacity to effectively monitor these subrecipients.
4. McPherson County should consider developing a templated sub-recipient monitoring plan to ensure consistent monitoring of subrecipients (cities, schools, non-profits) for compliance use of funds.
5. For all programs distributing funds to community businesses/churches, if not already in place, McPherson County should consider development of an application process and establish a review committee to ensure equal access to funds from potential qualified entities. The County should also appropriately advertise these programs within the community.
6. 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.

McPherson County needs to provide responses and documentation for the above Requests for Additional Information. Due to the nature and complexity of the proposed use of funds, the Office of Recovery seeks additional consultation with the County and will be contacting you soon to schedule a working session regarding the items noted in this memo.