

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

Date: September 3, 2020

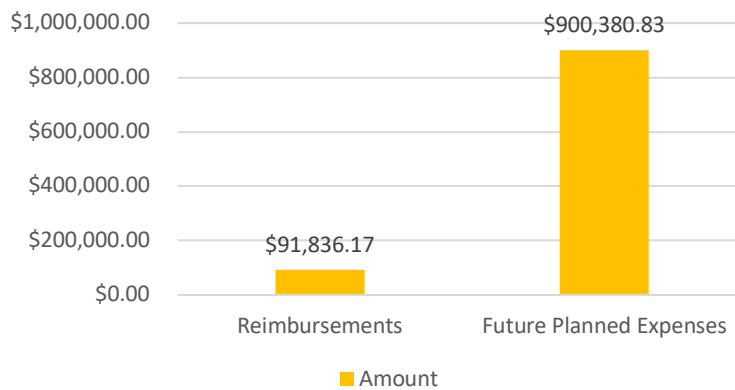
Re: Review of Reimbursement and Direct Aid Spending Plan for Rooks County

General Information

Population: 5,013
COVID-19 Cases: 25

Total Allocation Amount: \$992,217.00
Total Submitted for Reimbursement: \$91,836.17
Total Submitted for Future Planned Expenditures: \$900,380.83

SPENDING PLAN OVERVIEW



Reimbursement Request Overview

Total Amount for County Expenditures: \$91,836.17
Total Amount for Subrecipients: \$0.00

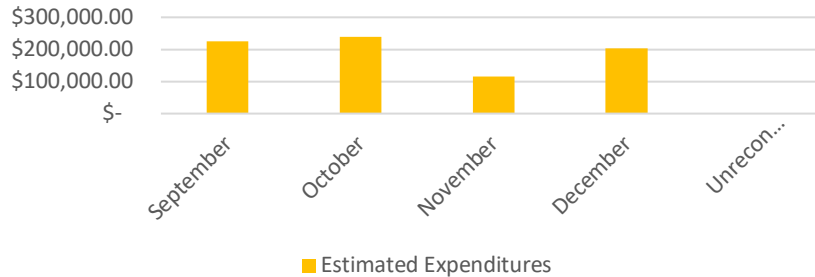
Subrecipients and Amounts

No transfers to subrecipients were proposed in Rooks County's Reimbursement Report.

Direct Aid Overview – Future Spending Plan

Total Amount for County Expenditures: \$320,380.83
Total Amount for Transfers: \$580,000.00
Total Amount for Programs: \$0.00

PROJECT SPEND DOWN RATE



Subrecipients/Transfers and Amounts

Subrecipient	Type	Amount
Plainville	City	\$35,000.00
Stockton	City	\$195,000.00
USD 269	Educational Institution	\$38,282.00
USD 270	Educational Institution	\$148,076.00
USD 271	Educational Institution	\$143,870.00
Sacred Heart	Educational Institution	\$19,772.00
Total		\$580,000.00

Proposed Programs

No programs were proposed in Rooks County's Direct Aid Plan.

Definitions

General Considerations – Summarizes county expenditure data.

Payroll Considerations – Summarizes county expenditure data on payroll expenses.

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

Rooks County has prioritized its reimbursement requests for county expenditures. Total county reimbursements equal 100% of all expenditures and no subrecipient requests were submitted for reimbursement review.

Rook County's substantially larger direct aid request prioritizes educational institution expenditures, which amount to 38.9% of the \$900,380.83 submitted for direct aid review. Transfers to subrecipients went from zero in reimbursements requests, to a total of \$580,000.00. Educational institutions account for 60.3% of transfer requests, while cities account for the remainder of requests.

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

Rooks 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 considerations are outlined below.

Payroll 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.

Modifications Required

No modifications are required at this time.

Conclusion

1. Based on the documents provided by Rooks County, it appears they have an adequate understanding of the eligibility requirements relative to CARES Act funding and have appropriately followed this process.
2. Rooks County has an appropriate Project Spend Down Rate representing a low risk of funds not being expended on or before December 30, 2020.
3. 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.

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Laura Kelly, Governor

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