

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

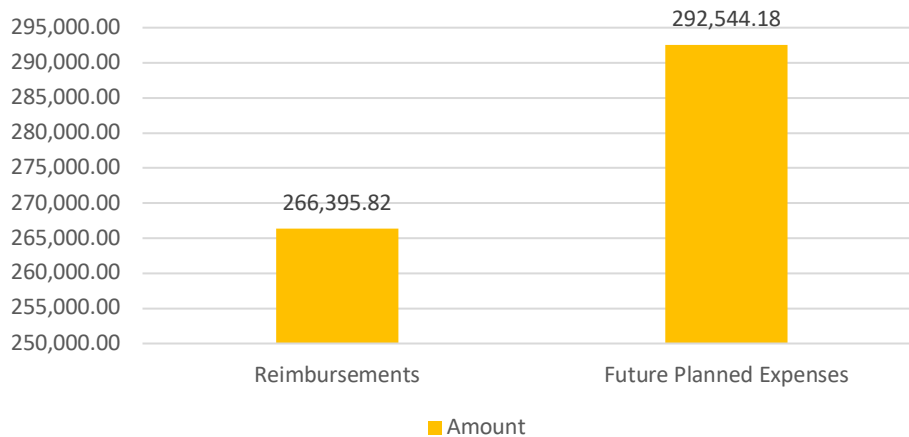
Date September 3, 2020
Re Review of Reimbursement and Direct Aid Spending Plan for Trego County

General Information

Population: 2,803
 COVID-19 Cases 08/17/2020: 7

Total Allocation Amount: \$558,939.78
 Total Submitted for Reimbursement: \$266,395.82
 Total Submitted for Future Planned Expenditures: \$292,544.18

SPENDING PLAN OVERVIEW



Reimbursement Request Overview

Total Amount for County Expenditures: \$258,436.77
 Total Amount for Subrecipients: \$7,959.05

Subrecipients and Amounts

Subrecipient	Type	Amount
USD 208	Educational Institution	\$7,400.70
City of WaKeeney	City	\$558.35
Total		\$ 7,959.05

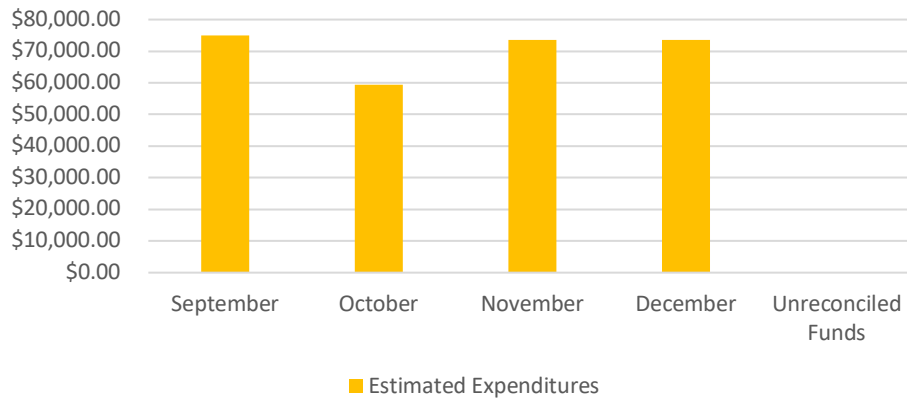
Direct Aid Overview – Future Spending Plan

Total Amount for County Expenditures: \$242,852.23

Total Amount for Transfers: \$49,691.95

Total Amount for Programs: \$242,852.23 (duplicate reporting of County Expenditures)

PROJECT SPEND DOWN RATE



Subrecipients/Transfers and Amounts

Subrecipient	Type	Amount
USD 208	Educational Institution	\$44,950.35
City of WaKeeney	City	\$4,741.60
Total		\$49,691.95

Proposed Programs

Program Title	Program Description	Program Budget Amount
COVID-19 Response	Departments within Trego County have been significantly impacted by COVID-19 and need supplies and PPE in response to mitigation efforts that need to be undertaken so that departments can continue to operate safely and effectively while continuing to be able to serve the public.	\$10,000
First Responder COVID-19 Disinfection and Mitigation	Trego County First Responders need to be able to disinfect their equipment and gear after incidents to protect themselves against the spread of the pandemic.	\$24,042.98
Technology Response for COVID-19 Pandemic	All county departments were impacted because of COVID-19, most had to change to contactless business, so these improvements will allow for better capabilities for Telework	\$28,500.00

and also more permanent ways of doing business. In the future of the pandemic these improvements will also allow departments who are impacted and also doing public information for COVID-19, to be able to create quality, eye catching color signs for the public to be able to understand procedures and processes. Also, the equipment will allow offices to have the ability to do mailings to the entire county population with information on pandemic related topics and ways the county is conducting business. In the future this can also be used by all first responder agencies to create maps for use in responding to incidents. This will also enhance the capabilities of the County Emergency Operation Center. During COVID-19 it became very important to put out changing and effective Public Information and this was accomplished through brochures that were placed in the food packages that was given to kids, also in the food pantry boxes and in the commodity distributions. The brochures included numbers to call if there was help needed with picking up supplies for someone, or if they were feeling sick. The brochures also included information and education on the pandemic and how to keep yourself and your family safe.

Due to the COVID-19 Pandemic the Emergency Manager opened the Emergency Operation Center at a partial level on March 12, 2020 and it continues to be open and functioning daily to provide information and also coordination to other departments within Trego County. Emergency Manager has daily virtual meetings with the State Operations Center and also keeps the EOC Team advised of changes and updates. 100% of the Emergency Manager's time has been dedicated to response and mitigation of the COVID-19 Pandemic. Because the SPARK monies have created an onslaught of work for the county employees, that have been tasked by the County Commissioners with doing all the administrative pay work on this project, they will be paid for the extra job duties.

Covid-19 Response Personnel Salaries

\$55,309.25

COVID-19 Response Facility

Multi-Purpose Response Facility, to provide storage for PPE Supplies, COVID-19

\$125,000.00

response trailers, serve as a Point of Dispensing facility for Health Department Vaccinations, etc. and also can be used for drive through elections if deemed necessary.

Total **\$242,852.23**

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

Trego County has prioritized its reimbursement requests for the County. Total County reimbursements equal 97% of all eligible expenditures, while educational institution requests total 2.8% of the \$266,395.82 submitted for reimbursement review.

Trego County’s direct aid request prioritizes County expenditures, which amount to 83% of the \$292,544.18 submitted for direct aid review. Planned transfers to subrecipients total \$49,691.95. Educational institutions account for 90.5% of transfer requests, while cities account for the remainder of requests. Proposed programs were listed, but duplicate the expenditures recorded for the County’s independent expenditures. The County needs to revisit which of these expenditures represent programs and which will be direct payments by the County and modify its direct aid request accordingly.

Trego County should ensure that these 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 were incurred before December 30, 2020.

Technical Understanding of SPARK Process

Trego 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. The County has duplicated program expenditures in its planned independent expenditures tab. Modifications are required to the direct aid plan to correct this error. Our identified risks and compliance considerations for these are outlined below.

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. Trego County COVID-19 Response Facility

\$125,000

Direct Aid

As this represents a significant 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.

3. Contract Cancellation

\$14,000

Reimbursement

The date issued for this expense is listed as 11/25/2019 which is prior to the start of the eligibility period. This proposed expense does not appear to be eligible for COVID-19 related purposes. The

County should review the expense again to ensure that it does meet the purpose and intent of CRF funding.

Spending Plan Request for Additional Information

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

Modifications Required

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

- Revisit Direct Aid plan. Determine whether expenditures belong in the Planned Independent Expenditures tab or represent proposed programs. Ensure there is no duplication of expenditure reporting.
- On the summary page of the Direct Aid plan, recalculate totals provided for planned independent expenditures and programs and align totals with detailed reporting.

Conclusion

1. Based on the documents provided by Trego County, it appears they have an adequate understanding of the eligibility requirements relative to CARES Act funding and have appropriately followed this process.
2. Trego 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 were incurred before December 30, 2020.

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