

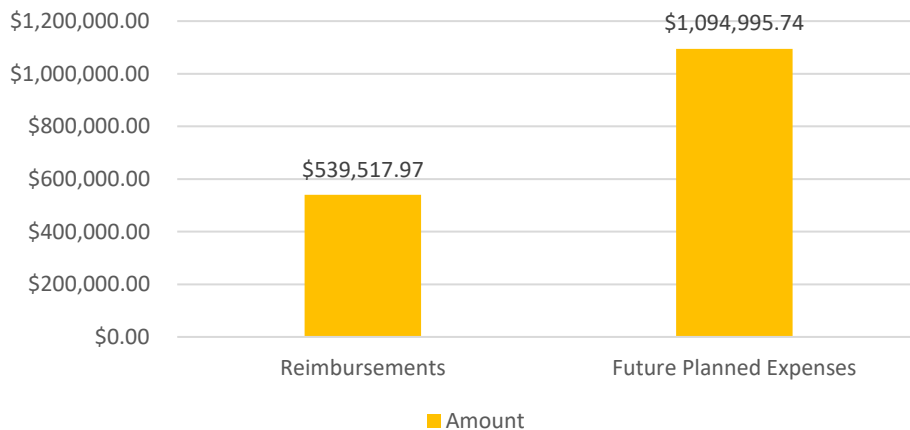
**SPARK ROUND 1 - LOCAL GOVERNMENT
 REIMBURSEMENT & DIRECT AID REVIEW
 MEMORANDUM**

Date September 5, 2020
Re Review of Reimbursement and Direct Aid Spending Plan for Wabaunsee County

General Information

Population: 6,931
 COVID-19 Cases as of 8/26/2020: 52
 Total Allocation Amount: \$1,460,915.00
 Total Submitted for Reimbursement: \$539,517.97
 Total Submitted for Future Planned Expenditures: \$1,094,995.74

SPENDING PLAN OVERVIEW



Reimbursement Request Overview

Total Amount for County Expenditures: \$9,381.61
 Total Amount for Subrecipients: \$530,136.36

Subrecipients and Amounts

Subrecipient	Type	Amount
USD 329	Educational Institution	\$209,392.68
USD 330 (Submission 1)	Educational Institution	\$173,598.71
USD 330 (Submission 2)	Educational Institution	\$110,229.57
USD 417	Educational Institution	\$32,441.21
City of Alma	City	\$2,795.93
City of Eskridge	City	\$1,078.34
City of Maple Hill	City	\$599.92
Total		\$530,136.36

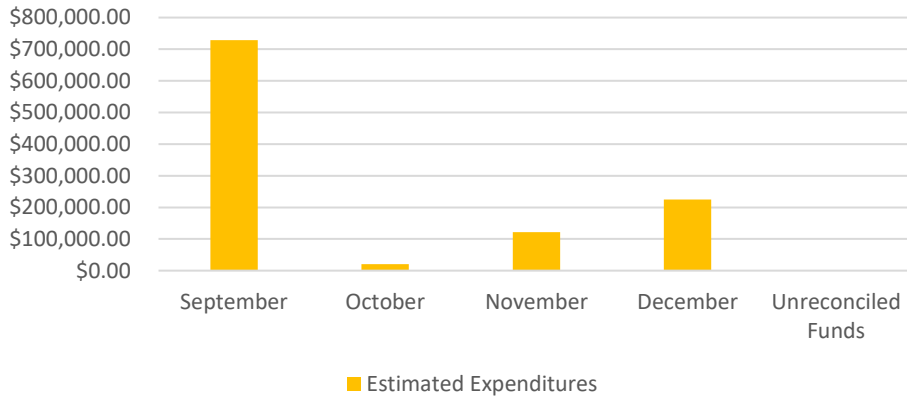
Direct Aid Overview – Future Spending Plan

Total Amount for County Expenditures: \$36,748.08

Total Amount for Transfers: \$200,103.96

Total Amount for Programs: \$858,143.70

PROJECT SPEND DOWN RATE



Subrecipients/Transfers and Amounts

Subrecipient	Type	Amount
City of Alma	City	\$17,468.00
City of Eskridge	City	\$7,510.00
City of Harveyville	City	\$22,055.00
City of Maple Hill	City	\$13,907.85
USD 330	Educational Institution	\$99,163.11
USD 417	Educational Institution	\$40,000.00
Total		\$200,103.96

Proposed Programs

Program Title	Program Description	Program Budget Amount
Business Grants	Aa small business grant program, managed by the Wabaunsee County Strengthening People and Revitalizing Kansas (SPARK) Committee, to help businesses affected by the coronavirus pandemic recover and reopen safely.	\$206,324.10
Non-Profit Grants	A nonprofit grant program, managed by the Wabaunsee County Strengthening People and Revitalizing Kansas (SPARK) Committee, to nonprofits that specifically serve disadvantaged, disabled, or senior populations.	\$37,730.59
District Court Improvements	A program improve temporary measures and add remote capability the District Court to protect health of employees, parties to the court, law	\$61,632.00

	enforcement officials, jurors, and members of the public through social distancing, remote proceedings, and other measures to minimize the risk of exposure.	
Rural Internet Expansion	To expand Internet services to residential homes in the Eskridge/Mercury communities, utilizing Mercury Wireless vendor. Expansion needed for purposes of telemedicine, telework and distance learning	\$241,000.00
St. John Lutheran School	Funds to assist the school to re-open and provide distance learning option to students.	\$37,400.00
First Responders	Providing new or expanded capabilities to first responders and establish an emergency operations center capability that allows County Departments - Health, Emergency Services, and Sheriff's Office - to coordinate their responses to the public, improve decision making and communicating with the public.	\$161,057.01
County Health Department	Provides purchase of a 4WD vehicle, including cargo capability, to conduct home health visits for isolated or underserved residents. In addition, this program provides \$8,000.00 in additional funding to resource unexpected, eligible COVID-19 expenses.	\$38,000.00
Multi-Purpose Building	The county does not have a hospital or an community emergency shelter available to residents Historically, area churches have served as emergency shelters but they lack the space and amenities to respond to largescale emergencies or a COVID-19 crisis. This project modifies a building just beginning construction to provide the space, ventilation, and flexibility necessary to serve as a medical shelter, quarantine facility, and/or non-congregate shelter. The facility can also serve as a drive-through swabbing, vaccination, or food distribution location, and emergency medical or non-congregate shelter capable of housing individuals in a safe manner.	\$75,000.00
Total		\$858,143.70

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

Wabaunsee County has prioritized its reimbursement requests for school districts. Total county reimbursements equal 1.7% of all expenditures, while school district requests total 97.4% of the \$539,517.97 submitted for reimbursement review. There is an additional \$173,598.71 between what was actually sent for reimbursement and what is listed on the The Reimbursement Summary Tab of the excel sheet reflects a total of \$365,818.26 to subrecipients, however the total for Reimbursement Overview for subrecipients totals \$530,136.36; reflecting a difference of \$173,598.77 in expenses. The County should review the expenses for reimbursements to subrecipients and reconcile to the correct total.

Wabaunsee County's direct aid request prioritizes business grant and rural internet programs, which amount to 40.9% of the \$1,094,995.74. Transfers to subrecipients totals \$200,103.96. School districts account for 69.5% of transfer requests while cities account for the remainder of requests.

Wabaunsee County has proposed many potential subrecipient arrangements. The County should ensure they have the appropriate level of administrative capacity to effectively monitor these subrecipients.

Wabaunsee County has proposed many subrecipient arrangements through grant programs. If not already in place, the County should develop an application process and establish a review committee to ensure access to funds from potential, qualified applicants. The County should also advertise all programs in the area.

Technical Understanding of SPARK Process

Wabaunsee 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, there are programs listed that appear to be direct transfers. Our identified risks and compliance considerations for these are outlined below.

Identified Compliance Considerations

Several items in the County's reimbursement and direct aid plan present possible risk:

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. Water hydrants at RV Campsite

\$5,500.00

Direct Aid

The City of Eskridge requests \$5,500 to "expand potable water services to 10 RV campsites that currently do not have water available." The County should ensure that this expense responds clearly to the purpose and intent of CRF funding, and its nexus to COVID-19 is well documented in the project file.

3. Utility Relief Grants

\$6,375.00

Direct Aid

Harveyville requests \$6,375.00 to assist an estimated 15 residents with \$85 in financial aid. This appears to be a grant program, administered by the City, and as such, 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 program and/or monitor any 3rd party entity responsible for administering the grant program.

Spending Plan Request for Additional Information

No additional information is requested at this time.

Modifications Required

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

1. Total reimbursements to subrecipients should be reviewed, with all detail and totals verified and reconciled.
2. The following programs proposed appear to qualify as direct transfers. The County should review and confirm correct classification of these requests:
 - District Court Improvements
 - Rural Internet Expansion
 - Lutheran School
 - First Responders
 - County Health Department
 - Multi-Purpose Building

Conclusion

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

3. Wabaunsee 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. Wabaunsee 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 the multiple Grant Programs, if not already in place, Wabaunsee 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.
6. Wabaunsee 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.

Subject to review of all considerations noted in this memo Wabaunsee County may proceed with implementation of its CARES Act funding allocation as outlined in its provided reimbursement and direct aid plan.