

TME Questions to FDEM

Can a building be retrofitted to house the influx of medical supplies?

Yes, I would probably want some better visibility on what retrofit is happening, but that expense would be eligible. I would not that Treasury has been pretty explicitly against permanent construction, but retrofitting would be appropriate.

If the counties have not started their FEMA claim, can all the expenses/personnel, etc be claimed under the Cares Act funds versus filing with FEMA?

We encourage counties to maximize the amount of federal resources they can bring into their community. Therefore, while there are expenses that can be claimed for both PA and CARES, we encourage counties to claim as much PA as they can and use CARES for expenses that are not eligible for PA.

Can equipment such as forklifts, hand trucks, etc be purchased for loading and unloading supplies coming into the county?

Yes, these costs would be eligible as long as they were substantially dedicated to COVID-19.

Do you want to see their spend plans?

We do not require spend plans but encourage counties to send them over so we can help flag and questions we may have or expenses we would like to flesh out more.

On the admin costs ... does that follow the same rules at PA where no more than 5% is be spent on admin?

We are finalizing what those caps look like but 5% would be a good standard to adhere to for the moment.

Can rural communities install broadband in case they have to do remote work due to COVID? I have read the broadband question on the Treasury site, but it is very confusing.

Yes, installing broadband would be eligible.

Can communities install conference line capabilities? This did not work well with all the non-face to face meetings.

Yes, that cost would be eligible.

Can a county purchase a metal building to be put on county owned property to store PPE?

We are seeking guidance on that very question from Treasury. If the expense is necessary and a county has exhausted all other available cost effective options, this expense may be eligible.

I had a county reach out to me regarding eligible expenses under the Cares Act Funding related to equipment usage. As you know with a PA claim, applicants are eligible to claim equipment usage. Is this an eligible Cares Act expense if they choose to forego filing their PA claim and put all activities under Cares? They would use the FEMA equipment rate doc and complete a spreadsheet with the backup document.

Yes, that should be eligible for CARES Act funding as long as the costs are in the POP, unbudgeted, and correlated to COVID-19. However in saying that, we would advise against a county forgoing PA for eligible costs so they could maximize the federal funding they could bring into the county.

We read the treasury guidance that specifically shows eligible expenditures and one bullet point is emergency medical response expenses, including emergency medical transportation related to COVID-19. This county is strapped under normal circumstances and there is no mutual aid. In between sanitizing the ambulances and limited staff, there response has suffered.

While Treasury makes final eligibility determinations, our interpretation of the Guidance would support that expense if all other cost effective options were exhausted and it was documented. Of course you would need to acquire the ambulance before December 30, 2020 or at least have in a contract with a vendor that it should arrive before then. We asked that question specifically of Treasury and if we get a more firm answer, I'll let you know but that's our approach right now

Can a hospital receive funds for COVID patient transfer that were not paid?

For hospitals, I would see the Guidance below and ensure your expense would be supported by this FAQ by Treasury

To what extent may a government use Fund payments to support the operations of private hospitals?

Governments may use Fund payments to support public or private hospitals to the extent that the costs are necessary expenditures incurred due to the COVID-19 public health emergency, but the form such assistance would take may differ. In particular, financial assistance to private hospitals could take the form of a grant or a short-term loan.

If a business grant program is developed, are there parameters set for guidance? such as can funds be given to 1099 contractors that suffered financially as a result of COVID-19?

The parameters can be set by the County. The main things to watch out for would be to ensure the costs being supported are eligible and fall under the three main guidelines. There are no restrictions against helping 1099 folks. The biggest thing is just to make sure you can identify individual need

With a business grant program, are bank fees covered to assist with the distribution of funds?

Are you talking about bank fees incurred by the County? If so, I would consider that an administrative cost and could be deemed as such by the County and would be covered.

We have one county that has a contract in place with DOC for 50 inmates daily to supplant their road department. With COVID, DOC has not released inmates since the beginning of this event taking their department down to 6 people. Are equipment purchases that were made to take place of the lack of work force eligible purchases? such as an excavator?

While Treasury determines final eligibility, I would lean toward no. Equipment that would be eligible would fall under other categories like an ambulance if you needed to expand fleet capacity, or maybe a truck and trailer to exclusively transport COVID PPE. Augmenting equipment in this manner would not be eligible by my estimation.

Are variable message boards eligible purchases? these are being used to display testing locations along with PSA messages to the community.

Yes this would be eligible as well as remarketing for the county for a PR campaign to drive folks back into the economy. That has been exclusively deemed eligible by Treasury guidance.

If a medical director is making certain equipment mandatory for EMS and fire personnel in response to COVID and there is documentation from the medical director documenting these demands, are those equipment purchases eligible?

That would probably depend on the equipment and how cost effective the purchase was. If there is a cheaper and more cost effective method, that is the route the county should work toward first. However, if there is implementation of equipment to prevent the spread or to protect the safety of public safety employees, that would probably be eligible without me knowing any more.

Is additional playground equipment and park reconfiguring eligible to maintain social distancing for families and children? Currently the parks are set up with equipment that is very close. They are wanting to purchase equipment for the community to encourage social distancing.

I will double check but I would lean toward no.

A few weeks ago, I asked about a county purchasing a metal building to store the PPE for COVID. At that time, you were waiting on guidance from Treasury. Have you gotten that guidance to date?

Not yet. I would still advise entertaining more cost effective methods if there is an opportunity to rent a facility instead of buying one.

If a county decides to use the Cares Act funds to match their PA claim, would they need to proceed with a first version even though they are still activated since the deadline of the Cares Act is December 2020? In addition, is the state picking up the 12.5% or would it be the whole 25%?

Let me check with Allison on this question

If a county decides to not file a PA claim and decides to use the Cares Act funds for the Cat B expenses, is OT only eligible? or can ST be claimed?

Generally overtime is explicitly eligible. Straight time would only be eligible if the time was unbudgeted. For example, a parks and rec employee that is now cleaning facilities because parks may be closed would be eligible for their straight time as long as the parks and rec dept could not pay their salary from the budget. If someone is doing different tasks and can not be paid from the standard budget, then this would be eligible.

For those counties that are deciding to use Cares Act funds instead of filing PA, we are stating that all the same documentation that would be required by FEMA should be gathered and submitted for Cares. Such as timecards, activity logs, pay stubs, equipment logs, invoices, quotes, and canceled checks. Is that accurate?

Yes that is accurate. However, counties are really not going to maximize the amount of funding they can bring into their community if they forgo the PA process. The way this works best for your clients is if they use PA for all eligible expenses and use CARES Act funding for their match and economic recovery or other non eligible PA expenses.

With retrofitting facilities owned by a county, what details do you need prior to retrofitting? I have one county that owns a building that needs a new roof and electrical upgrades. That facility would be used solely to house the PPE for the first responders and the community.

There would need to be some documentation that proves the renovation was necessary and it wasn't simply an upgrade because the county had access to some additional capital. There would need to be an assessment done that there were no other more cost effective options such as repair instead of replace.

If a county decides to enhance their senior citizens food delivery program, would a transport vehicle, such as a van be an eligible purchase?

Yes but there would need to be documentation that there was not a more cost effective option. Could the county rent or lease a vehicle to help facilitate the surge?

A lot of discussions with several counties is the idea of hiring temp employees or contractors to perform services for COVID, ie: cleaning crews, etc. Which is the more desirable use of funds?

That would be up to the county.

A thought is to purchase household dry goods and cleaning items and distribute them to those in need. Like the food banks, are these activities eligible?

Yes this would be eligible but food banks are ripe for federal duplication because of the vast array of federal programs to assist them. There would need to be some provision to ensure there was no duplication of benefits.

If a county is using historic contractors, would the documentation presented for backup be the same as the docs we produce for a PA claim?

Yes

For business grant programs, can counties give funds (with adequate backup and support docs) to businesses to keep their doors open versus paying for their losses that they faced over the last few months?

As long as there is an identification of individual need, that could be eligible. Inherently, if you are helping cover operating costs like reimbursing rent, mortgage, or utility bills, that is keeping them in business while maintaining an easy paper trail.

Will all funds in the initial 25% have to be expended before the additional agreements for the 75% are let?
We are still finalizing what Phase 2 looks like, however there will most likely be a provision that would allow a county to encumber funds from their 25% disbursement if they're holding them for a business program that will take months

Can you direct me to where I could find out what agencies/constitutional officers/court systems or departments have received some form of Cares funding? We do not want any duplication of funds being allocated. I have heard some hospitals are getting direct funds, schools, supervisor of elections, sheriff's offices, and health departments ... but that is all hearsay. We would like to be able to see those allocations if possible.

We don't have visibility on that here at DEM but I will check into it for you

One of our county's has a population of around 15k people. Their EMS stations are on opposite sides of the county and each one currently has one ambulance for a total of 2. I read your response on an ambulance purchase below but would purchasing two be an eligible for a county of that size. I know this seems like a simple question if the purchase is justified but my county administrator wanted me to ask before they bought two.

The Department of Treasury has been pretty hesitant on permanent purchases like this. While understanding that Treasury determines eligibility, if there is an unmet need in the county, and the county is unable to keep up with the transportation needs of COVID-19 positive residents, then the expense may be eligible. We have asked treasury specifically about the purchase of ambulances and have yet to hear back. If the county wants to go in that direction, I would document as much as I could. For example, another county in the Big Bend has to transport patients to Tallahassee and while their ambulance is on that trip (6 hours round trip), there is only 1 ambulance available for the county. Our advice was to write that justification and keep it on record and work through more cost effective methods and document those as well. Just remember that any contract with a vendor must stipulate delivery no later than December 30, 2020.

Smart Boards to be used in commission board rooms for training capabilities and to enhance the virtual BOCC meetings

This expense could be eligible to enhance virtual meetings to prevent the spread of COVID-19, and to conduct COVID-19 related trainings.

Quick Response vehicles to alleviate EMS for an EMT to respond to incidents and used to distribute PPE
Before purchasing, I would look into more cost effective methods. Could the county rent trucks to transport the PPE?