CARES Act
Local Government Program

Recovery Bureau

Rebuilding Together
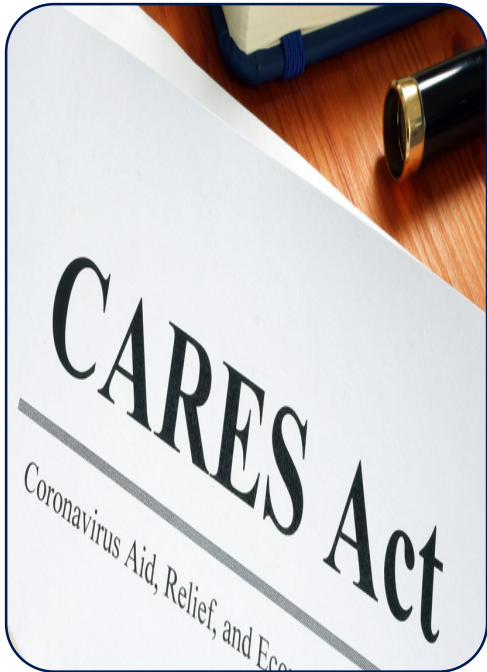
To explain the CARES Act Local Government Program and general expectations.
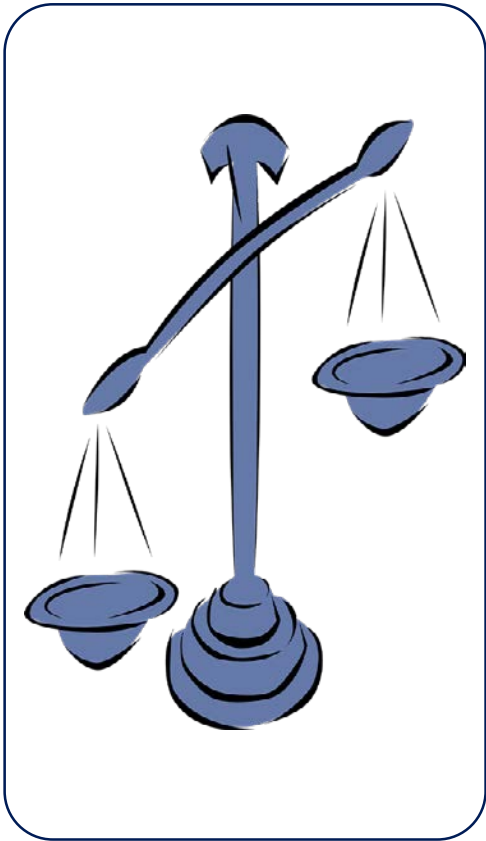
Phase 1 Funding

CARES Act Local Government Program

- Process for counties to receive CARES funding
- Counties accessed disbursement using the DEM Grants Management System
- Phase 1 agreements were sent out to counties for execution
- DEM has communicated the requirements of the federal appropriation as administered by US Treasury
  - Expenses must be incurred between March 1, 2020 and December 30, 2020
  - Expenses must be unbudgeted as of March 27, 2020
  - Expenses must have been a direct correlation to COVID-19
- Quarterly reports documenting expenses and projections are due beginning September 30, 2020

Remaining Allocation

If the county requests their remaining 75% allocation, they must enter into a new funding agreement with the Division.

Request for Reimbursement

Once a Phase 2 funding agreement is executed with the Division, they may submit Requests for Reimbursement (RFR) for expenses incurred beyond their Phase 1 funding.

- RFRs processed by the Division must meet the following criteria:
  - Expenses must be incurred between March 1, 2020 and December 30, 2020
  - Expenses must be unbudgeted as of March 27, 2020
  - Expenses must have a direct correlation to COVID-19
  - Any additional eligibility criteria as determined by the Division

Reimbursement Approval

- Once an RFR is approved by the Governor's Authorized Representative (GAR), the Division will release the funds to reimburse eligible expenses
- A county may submit RFRs as needed until they exhaust their allocated funding

The guidance that follows sets forth the Department of the Treasury's interpretation of limitations on permissible use of Fund payments.

Frequently Asked Questions

Frequently Asked Questions

Necessary expenditures incurred due to the public health emergency

The requirement that expenditures be incurred "due to" the public health emergency means that expenditures must be used for actions taken to respond to the public health emergency.

Costs not accounted for in the budget most recently approved as of March 27, 2020

A cost meets this requirement if either

(a) the cost cannot lawfully be funded using a line item, allotment, or allocation within that budget or

(b) the cost is for a substantially different use from any expected use of funds in such a line item, allotment, or allocation

Covered Period

Frequently Asked Questions

 Costs incurred during the period that begins on March 1, 2020, and ends on December 30, 2020

Payments may only be used to cover costs that were **incurred** during the period that begins on March 1, 2020, and ends on December 30, 2020 (the "covered period").

Frequently Asked Questions

Should I use CARES Act or FEMA PA for eligible expenses?

Counties should make a concerted effort to maximize their federal funding by utilizing FEMA PA for all eligible costs and reserving CARES Act funding for the non-federal match and other eligible CARES Act activities.

Is CARES Act funding only a funding of last resort?

There is no requirement that CARES funding be funding of last resort. So long as not duplicating sources of federal funding, you determine which funds to use, in accordance with program requirements.

What records should we retain for compliance?

- General ledgers to account for receipt of funds and disbursements of payments
- Budget records for 2019 and 2020
- Payroll, time records, and human resource records to support expenses
- Receipts of purchases
- Contracts and subcontracts entered into
- Grant agreements
- All documentation of reports, audits, and other monitoring of contractors and subcontractors
- All documentation supporting the performance outcomes of contracts and grant awards

Eligible Medical Expense Examples

Medical expenditures include:

- COVID-19-related expenses of public hospitals, clinics, and similar facilities
- Expenses of establishing temporary public medical facilities and other measures to increase COVID-19 treatment capacity, including related construction costs
- Costs of providing COVID-19 testing, including serological testing
- Emergency medical response expenses, including emergency medical transportation, related to COVID-19
- Expenses for establishing and operating public telemedicine capabilities for COVID-19- related treatment

Eligible Public Health Expense Examples

Public Health expenditures include:

- Expenses for communication and enforcement by State or local governments of public health orders related to COVID-19
- Expenses for acquisition and distribution of medical and protective supplies in connection with the COVID-19 public health emergency
- Expenses for disinfection of public areas and other facilities in response to the COVID-19 public health emergency
- Expenses for technical assistance to local authorities or other entities on mitigation of COVID-19-related threats to public health and safety
- Expenses for public safety measures undertaken in response to COVID-19
- Expenses for quarantining individuals

Payroll expenditures include:

Payroll expenses for public safety, public health, health care, human services, and similar employees whose services are substantially dedicated to mitigating or responding to the COVID19 public health emergency

Compliance Related Examples

Facilitating Compliance measures with COVID-19-related expenditures include:

- Expenses for food delivery to senior citizens and other vulnerable populations
- Expenses to facilitate distance learning, including technological improvements, in connection with school closings
- Expenses to improve telework capabilities for public employees
- Expenses of providing paid sick and paid family and medical leave to public employees
- COVID-19-related expenses of maintaining state prisons and county jails, including as relates to sanitation and improvement of social distancing measures
- Expenses for care for homeless populations provided to mitigate COVID-19 effects

Economic Support Provision Examples

Economic Support expenditures include:

- Expenditures related to the provision of grants to small businesses to reimburse the costs of business interruption caused by required closures
- Expenditures related to a State or local government payroll support program
- Unemployment insurance costs related to the COVID-19 public health emergency *if* such costs will not be reimbursed by the federal government pursuant to the CARES Act or otherwise

Ineligible Expenditure Examples

Ineligible Expenditures include:

The following is a list of examples of costs that would not be eligible expenditures of payments from the Fund.

- Expenses for the State share of Medicaid
- Damages covered by insurance
- Payroll or benefits expenses for employees whose work duties are not substantially dedicated to mitigating or responding to the COVID-19 public health emergency
- Expenses that have been or will be reimbursed under any federal program, such as the reimbursement by the federal government pursuant to the CARES Act of contributions by States to State unemployment funds
- Reimbursement to donors for donated items or services
- Workforce bonuses other than hazard pay or overtime
- Severance pay
- Legal settlements

NOT ELIGIBLE

Any Questions

Florida Division of Emergency Management

2555 Shumard Oak Blvd.

Tallahassee, FL 32399-2100

www.floridadisaster.org

https://floridapa.org/site/CARES-Act.cfm

FLCares@em.myflorida.com

Allison McLeary

Interim Recovery Bureau Chief

Allison.McLeary@em.myflorida.com

850-509-8643 (C)

Wesley Sapp

CARES Act Program Manager

Wesley.Sapp@em.myflorida.com

850-815-0426 (C)

For additional training needs, contact:

Recovery Education Program Administrator

FDEM-RecoveryTraining@em.myflorida.com

References & Resources

CARES Act, (2020). Retrieved from https://floridapa.org/site/CARES-Act.cfm

COVID-19 Guidance, (2020). Retrieved from https://floridapa.org/site/COVID-19-Guidance.cfm.

FDEM Recovery Q & A (2020). Retrieved from https://fdemgrantsmanagement.force.com/fdemcovid/s/fdem-recovery-faq.

FloridaPA.org (2020). Retrieved from https://floridapa.org/.

Public Assistance Program and Policy Guide (PAPPG), (April, 2018). Retrieved from https://www.fema.gov/media-library-data/1591036773793-4b7a09fc1680e09984629fc3ea77467a/PAPPG_3.1_508_FINAL_5-4-2018_ARCHIVED.pdf.

THE FLORIDA DIVISION OF EMERGENCY MANAGEMENT