

CARES Act – County FAQs

Updated June 22, 2020

As County Health Departments are executive branch of the State (DOH), and not under the jurisdiction or actual budget responsibility of the County, should their COVID related expenses (and salaries) be eligible for reimbursement from County CARES funding?

- Public health expenses are eligible under the CARES Act and through the Guidance provided by Treasury. Other counties have entered into agreements with health departments to address testing, contact tracing, nursing staff, and other needs. FDEM is working with DOH to provide an example of an agreement already in place specifically for CARES funding to help counties through that process.

If the County works with a local organization, such as a local Chamber of Commerce to intake and process business assistance grants and the Chamber agrees to charge a (reasonable) per application processing fee, can such processing fee be paid from the CARES Act funding.

- Yes, these costs would be eligible as outlined on Page 8 of the Guidance (*“Coronavirus Relief Fund; Frequently Asked Questions; Updated as of May 28, 2020”*).

Can actual administrative cost of county staff be offset if properly tracked by time code for administering local programs?

- Yes, these costs would be eligible as outlined on Page 8 of the Guidance (*“Coronavirus Relief Fund; Frequently Asked Questions; Updated as of May 28, 2020”*).

Can expenses be reimbursed under the Coronavirus Relief Fund if they are also reimbursable under another program (for example, FEMA PA)?

- Yes, there could be expenses that are eligible for both CRF and PA; however, you must not duplicate reimbursement.

In the Treasury FAQ from May 28, it says: “...as a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency.” Does this mean that these funds can cover all of a county’s payroll costs for these employees (e.g., all EMS employees, all Jail employees, etc.) from March 1 through December 30?

- The CRF may only be used for payroll costs that were unbudgeted in your county. Therefore, overtime or hiring an individual in a position that was not budgeted in this fiscal year would be eligible.

Given the amount of funding involved, for cash flow purposes it will be difficult for many counties to spend funds beyond the initial 25% allocation if this is only allowed on a reimbursement basis. How quickly can counties expect the reimbursement process to take? And would FDEM consider allowing counties to request advance payments?

- FDEM is working diligently on fleshing out the exact details of Phase 2. The Governor only recently announced this program and one week later the first payments were distributed. This should

serve as support that the state is committed to moving this money and getting it into the hands of counties as quickly as possible regardless of what Phase 2 looks like.

If a county wants to incur expenses such as pre-purchases of PPE or running an ad campaign to encourage citizens to get tested for COVID-19, should the county expense this under FEMA PA or through the CRF? It would be helpful to get detailed guidance as to which types of expenses should be reimbursed under which programs.

- Our advice to counties remains: If you have an expense that is eligible for Public Assistance, seek reimbursement through that program. If you have an expense that is not eligible for PA or there are concerns about cash flow, the CRF is the best route. We want counties to maximize their federal resources as best as possible.

Are COVID related constitutional officer expenses reimbursable?

- Yes, the County would have the ability to reimburse expenses incurred to other offices as long as they were incurred in the period of performance, were unbudgeted, and were dedicated to COVID-19.

We also have a significant amount of Clerk's IT overtime setting up staff for remote work due to COVID. Will the overtime be reimbursable?

- Yes, as long as you can attest to that overtime being exclusively committed to COVID-19 related activities.

The Clerk's IT also purchased additional hardware and licensing for COVID related activity. Will this be reimbursable? Some of this was funded by the Board, and some was funded by the Clerk.

- If you needed to purchase laptops to ensure your staff could work from home and continue to do their duties, that is absolutely eligible. In fact, that would go for any entity within the county. There are a number of other states that have implemented purchasing hardware for small businesses that don't have the cash flow to help employees work remotely.

If particular county does not spend all of its CARES Act allocation, where does the remainder go? Does it stay in Florida (reallocated to other counties or state), or go back to Feds?

- Any money not spent by the deadline MUST go back to Treasury; it is important for counties to put together plans to utilize their allocated funds.

Some of our agencies and Constitutional officers have received COVID-related funds already through other sources (ex. DOT), do these count towards the total County allocation?

- No; but, be mindful that there is no double dipping.

If a county had previously established a business relief/assistance program as a result of COVID-19 using since expended county funding sources, would replenishing these funds through this allocation be allowable?

- Yes, as the funds were non-budgeted and the expenditures were made due to COVID-19.

Are counties going to be able to recoup lost revenues?

- At this time, the answer is clearly NO. This is not allowed based on the language of the CARES Act and the federal guidance. This state is also unable to use funds to replenish lost revenues. This would require a change in federal law; groups are advocating for this, but it is not allowed at this point.

How do counties submit spending plans? Are these required?

- Spending plans are not required for the first 25% allocation; details for subsequent phases are currently being worked out.