

FAQ for CARES Funding County Allocation, Information Session 7.28.2020

All guidance below is based on our interpretation of the questions provided. The final determination will be made by the CDBG Program Specialist assigned to the project and based on program requirements and specific project defined activities.

Q: Would costs the County incurred to mitigate the risk of spreading COVID-19 in County facilities be eligible for reimbursement? For example, computers/iPads that were purchased for virtual meetings, plexiglass and other barriers to separate individuals, additional hand sanitizer and cleaning products, etc.?

A: Necessary expenses incurred to assist the public, in relation to COVID-19, would be eligible. Purchases or expenses that are to resume general government functions are not eligible.

Q: Are technology related expenses eligible for reimbursement? The County incurred increased costs to assign employees to work remotely in response to Governor's Stay Home. Stay Safe. Executive Order.

A: Technology expenses must be tied to providing public services specific to COVID-19. Telehealth equipment for residents to virtually access healthcare would be an example of an eligible expense. Purchases or expenses that are to resume general government functions are not eligible.

Q: Are payroll taxes and fringes eligible for reimbursement with CDBG funds? Or will CDBG cover wages only?

A: Only costs that exceed what is part of the *regular fringe plan* for an employee, has already been paid, and specific to COVID-19 services to the public or in support of that service would be eligible.

Q: Would costs incurred to reconfigure office space to allow for 6' social distancing or for cubical barriers to be installed qualify for reimbursement.

A: If such configuration is required to provide services to the public in response to COVID-19. Purchases or expenses that are to resume general government functions are not eligible.

Q: We have contracted for EMT, any issue with contracted reimbursement?

A: As it relates to COVID-19 specific responses, yes. If you have contracts, verify the scope of the contract and what the services were. Anything outside or specific to COVID-19 would be eligible. Keep supporting documentation on file and available upon request.

Q: Are we required to have an approved Public Participation Plan on file.

A: HUD requires that Grantees have a Citizen Participation Plan (24 CFR 570.486), which ensures two public hearings and other program specific considerations. This is not the same as a Public Participation Plan, which is not a requirement for CDBG funds.

Q: Can you confirm if "hazard pay" for front line workers is eligible for reimbursement?

A: If only paid their salary/contract amount, not exceeding normal circumstances, cannot be reimbursed. Reimbursement would be eligible if paid above and beyond salary due to COVID-19 and provides services to the public in response to COVID-19. Any questions should be directed to the CDBG Program Specialist assigned.

Q: Is there a limit to hazard pay per employee? Or can essential employee be defined, are public transportation covered?

A: See the response to the previous question.

Q: Can we file for reimbursement for additional costs for the hazard pay, e.g., FICA?

A: Only costs that exceed what is part of the *regular fringe plan* for an employee, has already been paid, and in response to COVID-19 specific to COVID-19 services to the public or in support of that service would be eligible.

Q: Would after school care for essential workers be covered? Would transportation to get kids to a after school care be covered?

Consult with your assigned CDBG Program Specialist this would be project specific and more details would be needed.

Email cdbg@michigan.gov to submit additional questions related to the CARES Funding County Allocation.

FAQ for CARES Funding County Allocation, Information Session 7.21.2020

All guidance below is based on our interpretation of the questions provided. The final determination will be made by the CDBG Program Specialist assigned to the project and based on program requirements and specific project defined activities.

Q: Would plexiglass be a reimbursable expense? Also, would our salaries and wages for our Emergency Management staff who has been responding to the pandemic since March also be eligible?

A: Plexiglass would have had to been purchased specifically in response to COVID-19. Wages paid in excess of the normal contract could be paid for employees providing services to the public in response to COVID-19.

Q: Would this include hazard pay for public health employees?

A: Only for reimbursable costs, wherein hazard pay was provided as a response to COVID-19 and exceeded established contracts or salaries. Additionally, hazard pay would have to already be paid to employees.

Q: Can you get reimbursed for fringes on hazard pay that are not covered by other funding that covers the base hazard pay?

A: Only costs that exceed what is part of the *regular fringe plan* for an employee, has already been paid, and in response to COVID-19 specific to COVID-19 services to the public or in support of that service would be eligible.

Q: Can hazard pay be eligible for "other" essential mandatory workers who provided support services for first responders? (Info & Tech, Maintenance, H/R, Finance, etc.)

A: This would need to be specific to the COVID-19 response and exceed normal agreed upon hours and pay. Additionally, the work cannot be related to the general conduct of business, it would have to be related to providing services to the public in response to COVID-19.

Q: If the allocation amount is more than your expenses to date, can you make multiple requests as future expenses are incurred?

A: The allocation is the “up-to” amount available for the County to seek reimbursement for, starting from January 21, 2020 to December 31, 2020. If the County doesn’t have the expenses to utilize the entire allocation, they should look to eligible non-entitlement communities who may seek reimbursement for activities outlined in grant agreement.

Q: Under the Public Safety and Public Health Payroll Reimbursement Program (PSPHPR), the Treasury Department in its FAQ’s states, “As a matter of administrative convenience, the entire payroll cost of an employee whose time is substantially dedicated to mitigating or responding to the COVID-19 public health emergency is eligible, provided that such payroll costs are incurred by December 30, 2020.” Here, it looks like the only eligible payroll expense is overtime. Can you confirm?

A: The CDBG program is not governed by the Public Safety and Public Health Payroll Reimbursement Program. Costs outlined in CDBG grant materials as being eligible are informed by the Department of Housing and Urban Development (HUD) and associated laws and regulations. Consult with your assigned CDBG Program Specialist, this would be project specific and more details needed.

Q: Would you put salaries and wages on the invoice summary form for reimbursement or is there a separate form for wages/salaries?

A: The CDBG Program will not require submittal of salaries and wages in detail. However, the County must keep copies of these records to ensure they are available upon request from either the State CDBG Program or HUD. When filling out the invoice summary (form 8A), provide the *aggregate* in the line item, “County Staff Overtime...\$XX”, or “County Staff Hazard Pay....\$XX”. Any specific questions related to structuring the reimbursement should be directed to the CDBG Program Specialist assigned.

Q: If we send this out to other cities, townships and villages within our county - are we responsible to complete their application or information?

A: The Grant Agreement will be between the County and MSF. The County would act as the pass-through. Yes, you will be acting on behalf of any sub-recipient of funds, as the Grantee. Only non-entitlement communities may be sub-recipient of funds.

Q: It states for purchase of sanitation equipment, does that include sanitation supplies/product?”

A: This would be eligible if directly related to COVID-19 response that exceeds normal contract deliverables or costs.

Q: For hazard pay - did a hazard pay policy have to be in place prior to the event to be reimbursed?

A: It’s advised communities have a policy in place that allowed for hazard pay to be incurred. For audit purposes you should have a policy in place to refer how you justified costs.

Q: Hazard Pay for Kitchen staff providing meals on wheels?

A: If County staff were previously paid hazard pay, the County may seek reimbursement only for hazard pay directly related to COVID-19.

Q: We contract for EMT, any issues for contract for reimbursement?

A: As it relates to COVID-19 specific responses, yes. If you have contracts, verify the scope of the contract and what the services were. Anything outside of scope or specific to COVID-19 would be eligible. Consult with CDBG Program Specialist to explain project specifics for better understanding.

Q: Can hazard pay retroactively be paid with this money?

A: No. The CDBG funds are for reimbursement of expenses that have been incurred/paid.

Q: Most of our staff are salary -but they worked a great deal of more hours - are they eligible for hazard pay - they were essential. They wouldn't have worked those hours IF COVID wasn't present?

A: If only paid their salary, not exceeding normal circumstances, the cost cannot be reimbursed. Reimbursement would be eligible if paid above and beyond salary due to COVID-19 and they provided specific services to the public in response to COVID-19.

Q: Hazard pay is different from overtime & never budgeted so would that be eligible for Public Health employees?

A: Hazard pay that has been paid out to eligible employees providing services to the public in response to COVID-19 would be eligible.

Q: During our shutdown, we had to bring a limited number of employees in to pay bills, emergency purchases etc. We had to pay these employees double time due to their union contracts. Would we be able to capture the extra pay for double time that was unplanned and unbudgeted?

A: Only if employees were necessary to continue business functions in support of providing services to the public in response to COVID-19, not for general government administration activities.

Q: Would construction projects related to protecting staff and the public by ensuring adequate social distancing and shielding be eligible for reimbursement? For example, installing a service window and/or electronic queuing kiosk, etc.?

A: Equipment purchased specific to providing COVID-19 related services or care would be eligible for reimbursement. Equipment purchased to resume general government services would not be eligible for reimbursement. Refer to CDBG Funding Guide, page 15, 'CARES COVID-19 Response, Public Services' to view all eligible reimbursement activities. Also, this may be a good discussion with your CDBG Program Specialist to better define specific to your project.

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