



# Arkansas Department of Finance and Administration

## Coronavirus Relief Fund Program Guidance Municipalities and Counties





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# 1. Coronavirus Relief Fund Overview

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The Coronavirus Aid, Relief, and Economic Security (CARES) Act was passed by Congress and then signed by President Trump on March 27, 2020. This act established funding to aid State and Local Governments for specific necessary uses as they respond to the COVID-19 pandemic. The State of Arkansas was awarded \$1.25 billion and has elected to transfer \$150 million to municipalities and counties (\$75 million for municipalities and \$75 million for counties). Sub-recipients should use this Program Guidance as a guiding document and not as an eligibility determination or policy.

## General Overview

The U.S. Department of the Treasury (Treasury) regularly updates the Coronavirus Relief Fund (CRF) Guidance and Frequently Asked Questions (FAQs) for eligible uses of funds. As Treasury continues to update program guidance, recipients and sub-recipients must stay up to date on programmatic changes. The Arkansas Department of Finance and Administration (DFA) staff will update this Arkansas DFA CRF Program Guidance as necessary.

The CARES Act provides that payments from the Fund may only be used to cover costs that:

1. are necessary expenditures incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID-19);
2. were not accounted for in the budget most recently approved as of March 27, 2020 (the date of enactment of the CARES Act) for the State or local governments; and
3. were incurred during the period that begins on March 1, 2020 and ends on December 30, 2020. For a cost to be considered incurred, performance or delivery must occur during the covered period, but payment of funds need not be made during that time.

Costs incurred under the CRF, and detailed in the Treasury guidance, constitute costs for goods or services whose performance or delivery occurred between March 1, 2020 and December 30, 2020. It is recognized that payment of funds need not be made during that period (though it is generally expected payment should be made within 90 days of service delivery)<sup>1</sup>. For instance, a service provider performing services to run a food bank may have delivered services up until the last day of the covered period, including providing a space, purchasing food, and distributing food to vulnerable populations. But the service provider is unlikely to have received, and paid, final invoices from vendors on the last day of the program. The services would still be considered incurred in the covered period, however, as the services were delivered or completed in the covered period, even though payment had not been completed. For purchases of supplies or equipment for covered activities under the CRF, delivery should be made in ample time to utilize the supplies or

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<sup>1</sup> US Treasury, Coronavirus Relief Fund – Guidance for State, Territorial, Local, and Tribal Governments, Updated September 2, 2020; pg. 2.



equipment within the covered period as a direct part of the government's COVID-19 response.

The most recent version of the Treasury guidance document can be found here (paper copies included in paper application):

<https://home.treasury.gov/system/files/136/Coronavirus-Relief-Fund-Guidance-for-State-Territorial-Local-and-Tribal-Governments.pdf>

The most recent version of the Treasury FAQs can be found here (paper copies included in paper application):

<https://home.treasury.gov/system/files/136/Coronavirus-Relief-Fund-Frequently-Asked-Questions.pdf>

The Treasury Office of Inspector General (OIG) is responsible for monitoring and oversight of the receipt, disbursement, and use of Coronavirus Relief Fund (CRF) payments as authorized by Title VI of the Social Security Act, as amended by Title V of Division A of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). Treasury OIG was also assigned authority to recover funds, in the event, that it is determined a recipient of a CRF payment failed to comply with requirements of subsection 601(d) of the Social Security Act, as amended, (42 U.S.C. 801(d)). Recipient reporting and record retention requirements are essential for the exercise of these responsibilities, including the conduct of audits and investigations by the OIG and Arkansas DFA.

On September 1, 2020, the prime recipient of CRF payments began reporting Coronavirus Disease 2019 (COVID-19) related costs incurred from March 1, 2020 to December 30, 2020 in the Federal GrantSolutions portal. While sub recipients are not responsible for reporting directly to Treasury OIG, following reporting requirements and recordkeeping is essential for the State's accurate reporting of CRF spending. All expenditures must fall into 1 of 8 pre-defined categories of work and subsequently into 1 of 18 categories of expenditures. These will be explained in the next section. In addition, the Treasury OIG guidance can be found at:

<https://www.treasury.gov/about/organizational-structure/ig/Audit%20Reports%20and%20Testimonies/OIG-CA-20-029.pdf>

### **Arkansas Municipalities and Counties Timeline**

Arkansas has set aside \$150 million of CRF funding for Municipalities and Counties. Each Municipality or County must apply to DFA and seek the approval of projects identifying CRF eligible project activities. The funding will be distributed to approved projects in two phases.

Phase I begins in the third week of mid-September and ends Friday, October 30, 2020.

Phase II begins Friday, October 30 and ends Monday, November 16, 2020. This is when Municipalities and Counties will have a second opportunity to apply for any remaining funds within their allocation total. Those that receive, through the approval of projects, the maximum allocation amount in Phase I will be completely done with the process.



After Phase II is completed on Monday, November 16, 2020, all remaining funds will revert to the State for reallocation by the Arkansas CARES Act Steering Committee.

- November 16<sup>th</sup>
  - All projects must be submitted in the CTC Portal for review.
  - 11:59 pm – Portal will be closed for any additional projects.
- December 1<sup>st</sup>
  - Payment requests should be submitted for expenditures paid on approved projects thru November 30.
  - Payment requests should be submitted for all estimated labor expenses thru December 15.
  - Submit adjustments to increase or decrease project budget amounts based upon anticipated final cost.
- December 15<sup>th</sup>
  - Final payment requests are to be submitted.



## 2. Categories of Work

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Eligible work, per Treasury guidelines, fall into eight categories. DFA has provided a nonexclusive list of examples to demonstrate the types of activities that are associated with each category of work.

1. Medical expenses:
  - COVID-19 related expenses for public hospitals, clinics, etc.;
  - Temporary public medical facilities.
2. Public Health Expenses:
  - Acquisition and distribution of medical and protective supplies (sanitizing products, personal protective equipment) for medical personnel, police officers, and other public employees working directly with the public;
  - Disinfection of public facilities;
  - Communication costs related to citizen outreach for the public health emergency with COVID-19 are also eligible administrative cost.
3. Payroll for public safety, public health, human services, and similar employees whose services are *substantially dedicated* to mitigating or responding to COVID-19 public health emergency:
  - See section on Defining Payroll Costs.
4. Actions to facilitate compliance with COVID-19 public health measures
5. Food delivery to residents, including senior citizens and other vulnerable populations.
6. Distance learning, including technological improvements, in connection with school closing due to COVID-19 and/or reopening of schools.
7. Provisions of economic support:
  - Grants to small business to reimburse for costs of business interruption caused by required closures;
  - Local payroll support programs.
8. Any other COVID-19 related expenses reasonably necessary to the function of government that satisfy the Fund's eligibility criteria.

While these categories of work reflect Treasury guidance, Treasury's OIG has provided a list of eligible expenditures. When applying for funds, Municipalities and Counties will be required to align expenses with the OIG reporting categories. This will involve breaking down the project costs and expenditures into the required eligible program expenditure categories to facilitate reporting compliance with OIG requirements.

As outlined in the OIG guidance, there are 18 categories of eligible expense for reporting purposes.<sup>2</sup> DFA recognizes that not all eligible program expenditures implemented by the State will also be implemented at the level of the Municipality and County governments. Likewise, DFA recognizes that some of the eligible program expenditures will be

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<sup>2</sup> The State of Arkansas has made determinations on which of the eligible expense categories do not overlap with State Level expenses and are eligible for sub recipients. Refer to the Eligible Expense document for additional information.



implemented at the Municipality and County government levels, but not at the Statewide level.

<b>CRF REPORTING CATEGORY</b>	<b>For STATE GOVERNMENT</b>	<b>For MUNICIPALITY and COUNTY GOVERNMENTS</b>
Budgeted Personnel and Services Diverted to a Substantially Different Use	X	X
COVID-19 Testing and Contact Tracing	X	
Economic Support (Other than Small Business, Housing, and Food Assistance)	X	
Expenses Associated with the Issuance of Tax Anticipation Notes	X	
Facilitating Distance Learning	X	X
Food Programs (when delivered by a qualified non-profit)		X
Housing Support (when delivered by a qualified non-profit)		X
Improve Telework Capabilities of Public Employees	X	X
Medical Expenses	X	X
Nursing Home Assistance	X	
Payroll for Public Health and Safety Employees	X	X
Personal Protective Equipment	X	X
Public Health Expenses	X	X
Small Business Assistance	X	
Unemployment Benefits	X	
Workers' Compensation	X	
Administrative Expenses	X	X
Other Items Not Listed Above - to include other eligible expenses that are not captured in the available expenditure categories <sup>3</sup>	X	X

<sup>3</sup> Municipality and County governments submitting under this category will need to demonstrate that costs are necessary and reasonable to the local government’s COVID-19 response, were unbudgeted, were incurred between March 1 and December 30, 2020, and do not qualify under the other CRF reporting categories. Costs submitted in this category are subject to DFA and the Arkansas CARES Act Steering Committee.



### 3. Duplication of Benefits Prohibition

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Entities have access to multiple funding sources to address COVID-19. However, applicants are prohibited from applying to several different funding streams for the same eligible activity. This is considered Duplication of Benefits and is prohibited. Entities should carefully review all available funding sources and the requirements from each source (e.g., pertaining to insurance and other local, state or federal government funding sources) to determine the most appropriate funding for their eligible expenditures. CRF funding cannot be requested for expenditures already covered by an existing, normally budgeted, federal funding source. Unexpected expenditures necessary due to the public health emergency can only be claimed against one funding source. A list of federal funding sources is available at <https://www.usa.gov/coronavirus>.

Record keeping is critical during this process to ensure reimbursement requests for expenditures are not sent to multiple funding sources for the same expenses. Entities must clearly understand which funding sources are associated with which activity as it is the responsibility of the entity to prevent duplication of benefits. To prove there is no duplication of benefits, entities must keep detailed records of all transactions involving each funding source and be able to trace each funding source for every cost and activity.

Entity responsibilities include accounting for funding receipts and expenditures, cash management, and maintaining adequate financial records. Post award, Municipality and County governments must ensure proper use of funds. Municipality and County governments are required to report any ineligible expenses funded erroneously and refund disallowed expenditures. They are also required to monitor sub-recipients if acting as a pass-through entity, and perform assessments and reviews, to ensure overall compliance with the terms and conditions of the funding source and authorizing award or subaward, as applicable. For more details, please refer to the section on [Documentation Requirements](#).

Some examples of other Federal funding sources with potential significant overlap with CRF funding include:

- Many overlapping eligible categories from FEMA Public Assistance (PA) and Coronavirus Relief Fund (as outlined in the FEMA PA [funding matrix](#)) identified in Section 8.
- COVID-19 Testing and Contact Tracing with state and U.S. Centers for Disease Control (CDC) or U.S. Department of Health and Human Services (HHS) COVID-19 response funding sources.
- Facilitating Distance Learning with U.S. Department of Education (DOE) - Education Relief Funds or U.S. Department of Agriculture Remote Learning grants.
- Small business assistance with Small Business Administration (SBA) Paycheck Protection Program.





## 4. Defining Payroll Costs

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Certain payroll costs of public employees are eligible for CRF funding. However, Municipality and County governments must meet the eligible definitions of scope of work to claim payroll costs.

The Treasury guidance reflects the intent of the CFR to provide aid to State governments to assist them with COVID-19 necessary expenditures. In furthering this intent, the Treasury guidance distinguishes three categories of eligible payroll costs:

- Public employees whose responsibilities are “**substantially different**” than their budgeted role;<sup>4</sup> due to the government’s response to, prevention of, or preparation for COVID-19;
- Public employees “**substantially dedicated**” to the government’s response to, prevention of, or preparation for COVID-19; and
- Public employees not “substantially different or dedicated”, but providing some portion of their time, tracked hourly on the entity’s payroll system, which can be allocated as an eligible contribution to the government’s response to, prevention of, or preparation for COVID-19.

### **Substantially different:**

For all public employees, whose jobs or operational responsibilities were changed to COVID-19-specific activities and are substantially different than their budgeted role, coverage of their payroll costs may be eligible. It is the responsibility of the entity to set the standard for the interpretation of “substantially different” activities from an employee’s originally budgeted role. This change must be documented and maintained as part of supporting documentation for the payroll cost.

- For example, a parks employee budgeted for park maintenance being redirected from grounds keeping to disinfecting public facilities to mitigate the spread of COVID-19 meets both the “substantially different” and “substantially dedicated” definition, and therefore the payroll costs would be eligible through the CRF.
- For example, a contracting officer being redirected to issue and contract COVID-19-related contracts does meet the specific activities related to COVID-19. However, the “substantially different” definition from their budgeted role has not been met since their budgeted role - to perform all contracting on behalf of the local government – has not changed and therefore the payroll costs would not be eligible through the CRF.

These costs should be reported under the CRF category “Budgeted Personnel and Services Diverted to a Substantially Different Use.”

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<sup>4</sup> US Treasury, Coronavirus Relief Fund – Frequently Asked Questions, August 10, 2020 (FAQ 2, FAQ 3)



### **Substantially dedicated:**

Public employees substantially dedicated to the government’s response to, prevention of, or preparation for COVID-19 are eligible. Treasury allows a government – as a matter of administrative convenience – to **presume** that specific categories of public employees are 100% substantially dedicated to the local government’s COVID-19 activities, unless indicated otherwise, and the entirety of their payroll costs may be covered by the CRF.<sup>5</sup>

These include employees in the following positions who are **directly participating** in the local government’s COVID-19 response:

- **Public Safety Employees**, including:
  - Police Officers, including State Police Officers
  - Sheriffs and Deputy Sheriffs
  - Firefighters
  - Emergency Medical Responders
  - Correctional and Detention Officers
  - Direct Support Positions of Public Safety employees, including dispatchers and supervisory personnel
- **Public Health Employees**, including:
  - Medical staff assigned to schools
  - Medical staff assigned to jails, prisons, or correctional institutions
  - Lab technicians, and other employees necessary for patient care
  - Public Health Department Employees directly engaged with matters of public health, and their supervisors
  - Employees providing direct medical care or health services to patients or the public, and their supervisors

These costs should be reported under the CRF Category “Payroll and Benefits for Public Health and Safety Employees”. Municipalities and Counties will still be required to retain payroll and budgetary documentation related to these payroll costs; however, entities will not be required to submit additional documentation or analysis to demonstrate that these positions were 100% substantially dedicated to the local government’s COVID-19 response. This OIG guidance does not permit a Municipality or County to request coverage for a Public Health and Safety positions who were not directly participating in the local government’s response but does lessen the administrative burden for local governments in documenting “substantially dedicated” employees.

For any cost not submitted for CRF reimbursement at 100%, the chief executive must certify specific circumstances indicating the reasons why the costs do not meet the baseline criteria for coverage under the CRF. In addition, the documentation requirement changes for these employees to time tracked by activity.

Note: Substantially dedicated 100% is related to the work of an individual. In the event a municipality or county has a limited amount of allocated funding to salary cost, the project

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<sup>5</sup> US Treasury, Coronavirus Relief Fund – Frequently Asked Questions, August 10, 2020 (FAQ 47)



should be written to cover the dollar amount of substantially dedicated employees with payroll costs on an individual basis submitted up to that amount.

**Non-substantially dedicated or different jobs:**

Municipality and County governments may also have many other employees where some portion of the employee’s job performance may meet the criteria of “substantially dedicated” or “substantially different”. Governments may track employee’s time related to COVID-19 eligible expenditures and allocate CRF to cover COVID-19-related payroll costs for the portion of the public employee’s time contributing to the government’s COVID-19 response. Other personnel documents, like shift assignments or duty rosters, may also serve as documentation of a less than full-time assignment to the response to or mitigation of the government’s COVID-19 response. However, governments would need to ensure that costs are tracked and documented consistently and clearly for an entity.<sup>6</sup>

Public health and public safety staff not performing substantially dedicated jobs may also have payroll expenses in some portion that was dedicated to mitigating or responding to COVID-19. Employees’ time must be tracked on an hourly basis to a COVID-19 activity and the entity must be able to demonstrate how the activity or job performed was related to COVID-19 response or mitigation efforts. Any time tracked on documentation to COVID-19 activity may be eligible with supporting documentation.

In addition, entities may use CRF for administrative leave pay pursuant to the Family First Coronavirus Response Act (FFCRA) for compliance with EFMLA and EPSL (federal legislation requiring monies to be paid for certain types of coronavirus related leave from work.) This is considered a payroll expense, not an administrative expense.

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<sup>6</sup> US Treasury, Coronavirus Relief Fund – Frequently Asked Questions, August 10, 2020 (FAQ 47)



## 5. Defining Administrative Costs

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Time spent on administrative work necessary due to COVID-19 Public Health Emergency may be eligible for CRF funding. Eligible administrative costs should be understood as the costs of administering the CRF grant, not the administrative costs associated with delivering a CRF eligible program. However, adequate tracked employee time and other supporting documentation, consistent across the implementing department or government, is required. Eligibility will be based on time tracked for individuals performing such administrative tasks.

Examples of eligible CRF administrative costs would include, but not be limited to, the following:

- Documentation retention to comply with the requirements outlined by the Uniform Federal Guidance, as defined by 2 CFR 200.303 internal controls, 2 CFR 200.330-332 sub-recipient monitoring and management, and 2 CFR 200 Subpart F audit requirements;
- Expenses related to reporting as required by the US Treasury and/or OIG related to the administration of CRF spending; or
- Expenses related to covering the expenses of an audit conducted under the Single Audit Act, subject to the limitations set forth in 2 CFR 200.425.

Costs that should **not** be reported as administrative costs, but which would still be deemed eligible if reported accurately in another eligible reporting category include the following:

- **Administrative leave pay pursuant to the Family First Coronavirus Response Act (FFCRA):** This expense should be reported under **Budgeted Personnel and Services Diverted to a Substantially Different Use**. This cost would be accurately reported as increased costs of administrative leave due to COVID-19, or due to compliance with federal COVID-19-specific leave policies. The eligible activity of this administrative leave is to curtail the transmission of COVID-19, despite the use of the term administrative leave, not the administration of CRF grant funding.
- **Communication costs related to public health information and outreach to government employees and citizenry with respect to COVID-19.** This expense should be reported under **Public Health**. This group of eligible activities, including the design, printing and distribution costs for media to ensure or promote compliance with CDC public health standards (including state guidelines), all support public health and reducing the spread of COVID-19. It does not matter whether these costs are incurred by Department of Public Health on the State level or by a Municipal Executive providing notice to employees and the citizenry of a small municipality. The eligible activity is public health, to curtail the transmission of COVID-19, not to administer CRF grant funding.



## 6. Documentation Requirements

In reporting CRF funding to DFA and preparing for future audits, it is important to keep sufficient records through documentation. Treasury has outlined the level of documentation required by direct recipients. Sub-recipients should keep a similar level of documentation listed here:

<https://www.treasury.gov/about/organizational-structure/ig/Audit%20Reports%20and%20Testimonies/OIG-CA-20-029.pdf>

Municipalities and Counties must also meet their own documentation requirements, as established by their internal policies and procedures or by local law or regulation.

The list below is illustrative of the types of documentation or levels of detail that may be requested to substantiate costs claimed under a federal award and may not be comprehensive. In fact, auditors or inspectors general monitoring CRF awards may request additional documentation related to eligible expenses.

<b>Payroll Costs, Internal Labor Costs</b>	
	Personnel / Pay Policy
	Pay Rate(s), Fringe Benefit Rate(s), and/or Indirect Cost Allocation Rate(s)
	Payroll Records

<b>Applicant-Owned Equipment Use</b>	
	Equipment Operator Name (consistent with claimed labor time for disaster-related activity)
	Type of Equipment, including year, make, model, size, capacity (e.g. horsepower, wattage, etc.)
	Usage Logs detailing time and location equipment used (consistent with claimed labor time for disaster-related activity)
	Schedule of rates, including rate components ( <u>FEMA's Equipment Rate Schedule</u> )

<b>Rented Equipment</b>	
	Rental Agreement, including rental terms and clause for termination for cause or convenience
	Lease vs. Purchase Analysis to demonstrate lease was more cost effective than purchase
	Invoices detailing rented equipment type, equipment rates, and days in use
	Proof(s) of Payment



<b>Purchased Equipment</b>	
	Purchase/Lease Agreement, and Equipment Tracking Number (e.g. Vehicle Identification Number, Equipment Tracking Number, etc.)
	Purchase Order(s) and/or Invoice(s)
	Proof(s) of Payment
	Salvage Value (if sold after disaster-related use), or Disposition Value (Fair Market Value estimate at end of disaster-related use)

<b>Supplies or Materials from Inventory</b>	
	Inventory or Supply Chain Records
	Historical Costs/Pricing (Can be provided through existing/prior contracts, purchase orders, or purchasing agreements)
	Daily Logs of supply utilization, including supply type and quantity

<b>Purchased Supplies or Materials</b>	
	Procurement and Contract Documentation or Purchasing Agreement
	Purchase Order(s) and/or Invoice(s), detailing quantity and unit price
	Proof(s) of Payment

<b>Contract Services</b>	
	Procurement Policy
	Advertisement(s)
	Request for Proposals, Request for Quotes, or Invitation to Bid detailing scope of services, method of evaluating bidders, and process to submit proposals, quotes, or bids
	All submitted proposals, quotes, or bids
	Cost or Price Analysis
	Bid Evaluation, Notification of Award, Award Approval
	Executed Contract, including applicable required federal contract language identified in <u>2 CFR 200 Appendix II</u> , detailing contract terms, payment structure, process to amend/terminate contract
	Invoices detailing dates worked, scope of services rendered, and request for payment
	Proof(s) of Payment
	<b>FOR TIME AND MATERIALS CONTRACTS:</b> <ul style="list-style-type: none"> <li>• Justification of the use of Time and Materials Contract Structure</li> <li>• Monitoring Plan or Documentation of Monitoring T&amp;M Structure</li> </ul>



	<p><b>FOR SOLE-SOURCE CONTRACTS:</b></p> <ul style="list-style-type: none"> <li>• Justification of the use of Sole-Source Method of Procurement, including demonstration that competition was insufficient or infeasible, justification of exigency or emergency, and/or written approval from awarding agency or pass-through agency</li> <li>• Cost reasonableness justification</li> </ul>
	<p><b>FOR COSTS INCURRED THROUGH MUTUAL AID AGREEMENTS:</b></p> <ul style="list-style-type: none"> <li>• Executed copy of mutual aid agreement and services requested</li> <li>• Log of mutual aid goods or services received or rendered</li> <li>• Requests for payment</li> </ul>

<b>Donations</b>	
	Receipt or Log of Donated Item, including quantity and estimated unit value and date of receipt
	Receipt or Log of Donated Service, including individual/organization providing service, days/hours worked, location worked, and description of work or services provided
	Donors, including name of individual or organization

<b>Other Documentation</b>	
	Applicable insurance policies (e.g. property insurance, business interruption insurance, etc.)
	Documentation that demonstrates legal responsibility for an activity and/or facility
	Documentation to demonstrate compliance with environmental or historical preservation requirements, such as permits
	Relevant Correspondence, Operational Narratives, or Photographs demonstrating disaster-related activity





## 7. Documentation Retention Requirements

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The Treasury OIG guidance<sup>7</sup> requires that records shall be maintained for a period of **five (5) years** after final payment is made using Coronavirus Relief Fund monies. These record retention requirements are applicable to all prime recipients and their grantees and subgrant recipients, contractors, and other levels of government that received transfers of Coronavirus Relief Fund payments from prime recipients.

Records to support compliance with subsection 601(d) may include, but are not limited to, copies of the following:

1. General ledger and subsidiary ledgers used to account for (a) the receipt of Coronavirus Relief Fund payments and (b) the disbursements from such payments to meet eligible expenses related to the public health emergency due to COVID-19;
2. Budget records for 2019 and 2020;
3. Payroll, time records, human resource records to support costs incurred for payroll expenses related to addressing the public health emergency due to COVID-19;
4. Receipt of purchases made related to addressing the public health emergency due to COVID-19;
5. Contracts and subcontracts entered using Coronavirus Relief Fund payments and all documents related to such contracts;
6. Grant agreements, grant subawards, and transfer agreements entered using Coronavirus Relief Fund payments and all documents related to such awards;
7. All documentation of reports, audits, and other monitoring of contractors, including subcontractors, and grant recipient and subrecipients;
8. All documentation supporting the performance outcomes of contracts, subcontracts, grant awards, and grant recipient subawards;
9. All internal and external email/electronic communications related to use of Coronavirus Relief Fund payments; and
10. All investigative files and inquiry reports involving Coronavirus Relief Fund payments.

For more information regarding federal reporting requirements, CRF Funding is subject to Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards under 2 CFR 200.

Municipalities and Counties must also meet their own documentation requirements, as established by their internal policies and procedures or by local law or regulation. If local requirements and the requirements of the federal award are in conflict, defer to the more restrictive requirement.

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<sup>7</sup> <https://home.treasury.gov/system/files/136/IG-Coronavirus-Relief-Fund-Recipient-Reporting-Record-Keeping-Requirements.pdf>





## 8. FEMA PA / CRF Funding Matrix

Entities should use this funding matrix to identify projects that are eligible under both FEMA Public Assistance (PA) and CRF. Entities are encouraged to use CRF funds on projects that would be outside the FEMA PA scope to maximize recovery outcomes and avoid Duplication of Benefits.

This tool is intended to provide context and guidance for the strategic assessment of COVID-19-related costs and potential available funding sources. Eligibility determinations should defer to written guidance from federal and state funding agencies. Categories of costs and activities are not comprehensive, but illustrative of common examples of activities and costs incurred through COVID-19 response, recovery, and prevention actions.

COVID-19 Response Activity		FEMA Public Assistance (PA)	Coronavirus Relief Fund (CRF)
<b>Incident Command, Emergency Management, or Preparedness Activities</b>	Emergency operations center (EOC) activities, emergency management	X	X
	Public facility cleaning and disinfection	⊕	X
	Public dissemination of information, including public health warnings and guidance	X	X
	Pre-positioning of supplies, equipment, or other resources	X	X
	Security, law enforcement, or patrolling	⊕	X
	Training associated with COVID-19 Response Activities	X	X
	Technical Assistance for Public Health Threat Mitigation, Planning, or Preparedness	X	X
	Meals for Emergency Workers	X	X
<b>COVID-19 Testing</b>	Diagnostic Testing for Symptomatic Patients	X	X
	Drive Through, Mobile, or Community Based Testing Sites	X	X
	Testing for Healthcare Professionals, First Responders, or other Essential Staff	X	X
	Facility Entrance Screening (Temperature Checks, Mask Checks, or Additional Security Controls)	⊕	X
	Serology/Antibody Testing		X
	Surveillance, Epidemiology, Contact Tracing, Infection Control Activities		X



COVID-19 Response Activity		FEMA Public Assistance (PA)	Coronavirus Relief Fund (CRF)
<b>Purchase or Renting of Supplies, Materials, or Equipment</b>	Personal Protective Equipment (PPE)	⊕	X
	Ventilators, Respirators, or Specialized Medical Equipment	◇	X
	Hand sanitizer, soap, and other hygiene supplies	X	X
	Cleaning Supplies or Equipment	⊕	X
	Medical Supplies	⊕	X
	Office Supplies/General Operating Supplies Specific to COVID-19 Response or Mitigation Activities	⊕	X
	Laboratory/Testing Supplies	X	X
<b>Medical Care for COVID-19 Patients</b>	Emergency Care, Triage, or Emergency Intensive Care for treatment, stabilization, and monitoring of COVID-19 Patients	X	X
	Emergency Medical Transport	X	X
	Prescriptions or therapeutics for Care of COVID-19 Patients	◇	X
	Medical Waste Disposal	X	X
	Storage of Human Remains or Mortuary Services	◇	X
	Establishing a medical operations center (MOC) and coordinating medical care	◇	X
	Training associated with COVID-19 Medical Care	◇	X
	Inpatient Clinical Care for COVID-19 Patients	◇	X
<b>Facility Retrofits and/or Temporary Facilities</b>	Temporary Facilities, such as tents, portable buildings, mobile medical units, or Alternate Care Facilities; including mobilization/demobilization of facilities, operating and maintenance costs, wrap around services, and necessary administrative costs	◇	X
	Expanded Facilities or Temporary Modifications to Patient Rooms, Testing Areas, or Hospital Support Areas	X	X
	Improving air flow, air filtration, or updating HVAC systems to mitigate airborne particle transmission and spread.		X
	Permanent Modifications, Acquiring Facilities, or Construction Activities to Increase Testing or Treatment Capacity for COVID-19 Response	⊕	



COVID-19 Response Activity		FEMA Public Assistance (PA)	Coronavirus Relief Fund (CRF)
<b>Sheltering</b>	Acquiring/rehabilitating a facility to establish or expand sheltering capacity		X
	Temporary lodging for isolation and/or quarantine	X	X
	Healthcare worker and first responder temporary lodging	X	X
	Non-congregate sheltering	X	X
	Sheltering for Homeless or Most At-Risk Populations		X
	Transportation for Sheltered Individuals for Necessary Medical Care		X
	Feeding programs for Most At-Risk Populations, Sheltering	±	X
<b>Payroll and Labor</b>	Budgeted Employee serving in COVID-19 Response Capacity, Regular Time		X
	Budgeted Employee serving in COVID-19 Response Capacity, Overtime	X	X
	Employee Salaries and Benefits, <b>Not</b> Associated with COVID-19 Response Work		
	Temporary Employee (Unbudgeted) serving in COVID-19 Response Capacity <b>or</b> Backfill for Budgeted Employees	X	X
	Increased cost of administrative leave due to COVID-19		X
	Contract Employees Performing COVID-19 Response/Recovery Activity, including labor and reasonable and necessary expenses (travel, per diem, etc.)	X	X



COVID-19 Response Activity		FEMA Public Assistance (PA)	Coronavirus Relief Fund (CRF)
<b>Social Distancing</b>	Expansion or Start Up of Telehealth, including Training, Technology, and Equipment		X
	Expansion or Start Up of Distance Learning, including Training, Technology, and Equipment		X
	Transitioning to Telework, including Technology and Equipment		X
	Establishing broadband "hotspots" to support access to high-speed internet for students, employees, or the public		X
	Working space modifications, including updated layout, changes to furniture, or installation of additional features that promote social distancing		X
	School re-opening, including disinfection, distribution of PPE, or temporary modifications to facilities		X
	Other costs associated with maintaining social distancing protocols		X
<b>Economic Development</b>	Workforce Redevelopment, Entrepreneurial Support Programs, including training and employment assistance		X
	Emergency Rent/Mortgage Assistance or Relief		X
	Unemployment Assistance, including contributing to State Unemployment Insurance Fund or Providing Local Match to Lost Wages Assistance		≠
	Small Business Loans or Temporary Financial Assistance		X
	Capital Construction Targeted for Economic Recovery, including acquiring, constructing, or rehabilitating public facilities with targeted economic development goals		
	Broadband Expansion for Economic Recovery		
	Refund of Tuition (or other related educational expenses)		
	Emergency Financial Aid		≠
Economic Recovery Planning			
<b>Loss of Revenue</b>	Loss of Revenue, or costs otherwise covered by revenue lost due to COVID-19		

Guidance as of:  
9/9/2020



Key	
X	Costs may be eligible for reimbursement if they are determined to be necessary and reasonable for actual or projected need for COVID-19 response activity. Costs must be necessary, reasonable, documented, allocable to the grant or funding source, and generally cannot supplant already budgeted costs, or duplicate benefits from more than one federal program for a cost or activity.
≠	Costs may have limited eligibility, based on facility type or emergency protective measure action, i.e. limited to a healthcare or first responder setting, or to a limited time period. Or activity eligibility may have limited applicability, based on guidance from the federal or state agency.
◇	<b>FEMA Policy FP 104-010-04</b> ; COVID-19 Disaster Specific Guidance for COVID-19-related Medical Care, Expanded Eligibility of Emergency Protective Measures Activities.
	Ineligible per FEMA PA, CRF and/or DFA guidance.