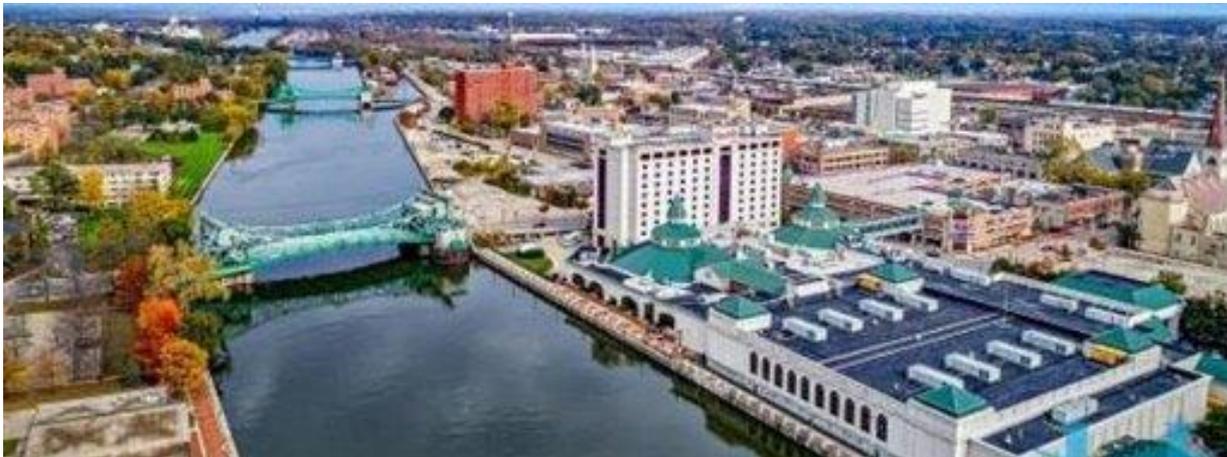




# WILL COUNTY CARES ACT CORONAVIRUS RELIEF FUND (CRF) LOCAL GOVERNMENT ASSISTANCE PROGRAM WEBINAR

*Presented August 12 & 14, 2020*



# WELCOME & INTRODUCTIONS

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## WITH US TODAY – BRONNER

- Don Davis, Director of Professional Services
- Daniel Hughes, Government Services Manager
- Katie Homan, Government Services Consultant
- Matt D’Onofrio, Government Services Consultant

Bronner Group, LLC is a professional services firm hired by Will County to help administer its CRF program and ensure compliance with CRF requirements.

## GUIDANCE PROVIDED TODAY ON:

- Allocations and Funding
- CRF Eligibility & Requirements
- Application Process
- Questions

**Please submit questions  
throughout the presentation  
in the Zoom Chat**



# ALLOCATIONS & FUNDING

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# FUNDING LANDSCAPE: CARES ACT IN FOCUS

## Coronavirus Aid, Relief, and Economic Security (CARES) Act

### Coronavirus Relief Fund (CRF)

- \$150 billion
- Direct funding to states and local governments with over 500k pop.

### Education Stabilization Fund

- \$30.75 billion
- \$14 billion to Higher education
- \$13 billion to K-12
- \$3 billion to Governors

### Paycheck Protection Program

- \$350 billion (\$300b later added)
- Grants to businesses to cover payroll, critical operating expenses

### Housing & Urban Development

- \$17 billion
- CDBG, ESG, and HOPWA
- Public Housing, Section 8
- Elderly, disabled housing

### Election Assistance Grants

- \$300 million
- State/local election assistance
- Help America Vote Act formula

### Economic Development Admin.

- \$1.5 billion
- Support local econ. development and public works investment
- State, local governments eligible

### FEMA Disaster Relief Fund

- \$45 billion
- Assistance to state and local governments for reimbursement of emergency expenses

### Public Health Funding

- \$1.5 billion for states (CDC)
- \$100 billion to healthcare providers
- \$1 billion to CSBG

### Economic Stabilization Fund

- \$454 billion
- Loans and loan guarantees to support state and local governments



## WILL COUNTY FUNDS ALLOCATED TO DATE

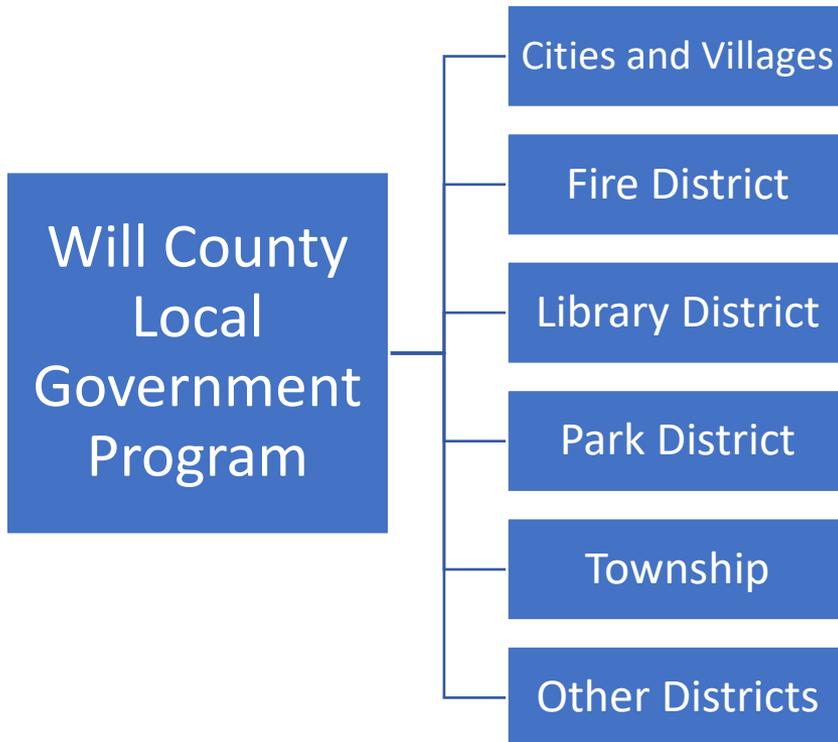
Preliminary allocations of CARES Funding within Will County are listed by category below

CATEGORY	\$ ALLOCATED	% ALLOCATED
<b>Local Taxing Bodies</b>	<b>\$33,145,000</b>	<b>27.5%</b>
County	\$33,145,000	27.5%
Businesses/Farms	\$24,106,000	20%
Shelter/Food/Utilities	\$12,053,000	10%
Non-Profits (not shelter, etc.)	\$6,026,000	5%
Contingency/ To Be Determined	\$12,053,000	10%
Total	\$120,529,000	100%



# ALLOCATIONS

**THE COUNTY'S GOAL IS TO OPTIMIZE CRF RESOURCES ACROSS MULTIPLE NEEDS AND PRIORITIES**



- The Will County Local Government Assistance program is intended to financially support governments in responding to the COVID-19 emergency.
- Will County has allocated over \$33,000,000 to support local governments.
- Currently School Districts are not eligible due to alternative sources of funds.



# ALLOCATIONS

- Cities and villages within Will County will receive a per capita allocation of \$41.25 per person (same as State’s Local CURE program)
- Other local governments will receive an equal allocation based on the type of entity.
- Local governments receive an allocation for planning/budgeting purposes.
- Local governments will be reimbursed for eligible costs incurred.

Local Government Entities	Allocation Amount
Cities and Villages	\$41.25 per capita for Will County residents
Fire District	\$35,000
Library District	\$15,000
Park District	\$25,000
Township	\$10,000
Other Districts	\$15,000

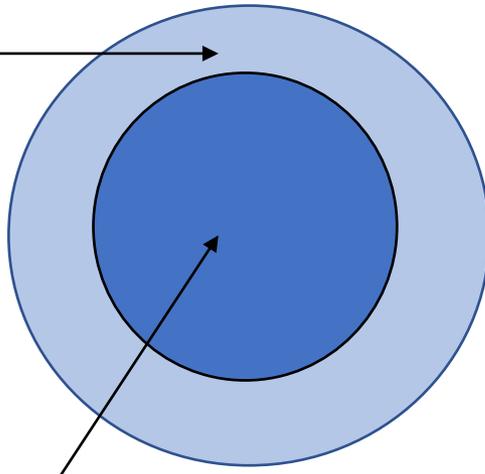


# MAXIMIZE FEMA FUNDING

**THERE IS OVERLAP IN EXPENSE ELIGIBILITY BETWEEN FEMA AND CRF. IT IS HIGHLY RECOMMENDED TO APPLY FOR BOTH TO MAXIMIZE THE USE OF FEDERAL FUNDING.**

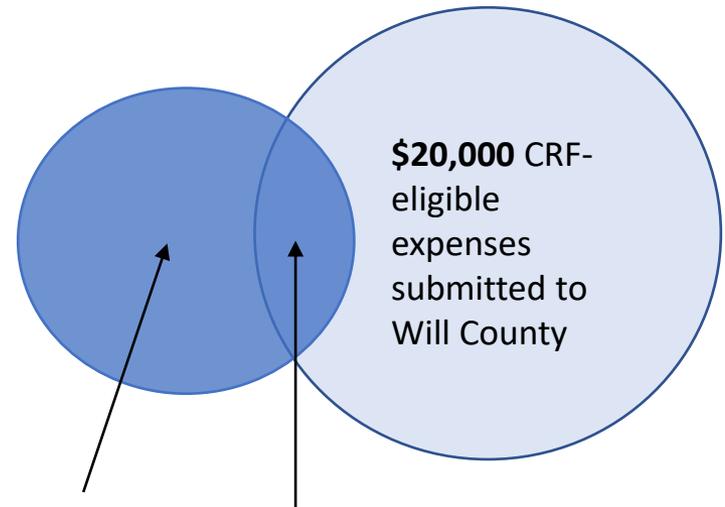
**Scenario 1:** Total of **\$20,000** Reimbursed – without FEMA Public Assistance

**\$20,000** of CRF eligible expenses submitted to Will County



**\$10,000** of eligible expenses **NOT** submitted to FEMA

**Scenario 2:** Total of **\$27,500** Reimbursed – with FEMA Public Assistance



**\$10,000** of eligible expenses submitted to FEMA (reimbursed at 75%- **\$7,500**)

**\$2,500** local match paid for with CRF



# CRF ELIGIBILITY & REQUIREMENTS

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# OVERVIEW OF CRF REQUIREMENTS

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## SECTION 601(D) OF THE SOCIAL SECURITY ACT LIMITS CRF TO EXPENSES THAT:

1. Are COVID-19 related
2. Do not supplant existing budgeted expenses
3. Incurred between March 1 and December 30, 2020

## FOUR KEY POINTS FROM TREASURY GUIDANCE:

- A. County can determine who to fund and the amount of funding
- B. County cannot add restrictions on how local governments use funds, other than to ensure compliance
- C. Governments cannot use funds to make up for lost revenue (this may change with new legislation)
- D. Benefits cannot be duplicated



## COVID-19 RELATED

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Expenditures must be incurred due to the COVID-19 public health emergency.

This includes implementing measures to prevent and mitigate the spread of COVID-19.

It also includes addressing economic distress, such as programs to

- provide food and housing assistance and
- economic assistance to small business and nonprofits



# COVID RELATED – ELIGIBLE EXPENSE

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## Eligible Expenditure Categories:

- Administrative Expenses
- Budgeted Personnel and Services Diverted to a Substantially Different Use
- COVID-19 Testing and Contact Tracing
- Economic Support (Other than Small Business, Housing, and Food Assistance)
- Expenses Associated with the Issuance of Tax Anticipation Notes
- Facilitating Distance Learning
- Food Programs
- Housing Support
- Improve Telework Capabilities of Public Employees
- Medical Expenses
- Nursing Home Assistance
- Payroll for Public Health and Safety Employees
- Personal Protective Equipment
- Public Health Expenses
- Small Business Assistance
- Unemployment Benefits
- Workers' Compensation
- Items Not Listed Above - to include other eligible expenses that are not captured in the available expenditure categories



# NON-ELIGIBLE EXPENSES

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## **Non-allowable expenditures include, but are not limited to:**

- Non-COVID-19 related expenses
- Revenue shortfall (This may change with pending legislation)
- Damages covered by insurance
- Expenses that have been or will be reimbursed by any federal/state program
- Reimbursement to donors for donated items or services
- Severance pay
- Legal settlements
- Payroll expenses for employees whose work duties are not substantially dedicated to mitigating or responding to the COVID-19 public health emergency.
- Bonuses or incentives and permanent salary increases are not eligible



# GUIDANCE – ELIGIBLE PERSONNEL COSTS

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## **Budgeted Personnel and Services Diverted to a Substantially Different Use**

- Personnel deployed from their traditional role who spend at least 51% of their time on COVID-19 response or mitigation.
- It does not qualify if the employee worked from home but did same work.
- It does not qualify if the employee performed normal duties but used extra safety precautions.
- Current interpretation is only the time worked over 51% is eligible for reimbursement
- Benefits are eligible. (Currently do not include pension benefits and indirect costs.)

## **Payroll for Public Health and Safety Employees**

- Payroll costs are not automatically eligible
- All time spent on COVID related work is eligible if documented. (Do not utilize the 51% threshold)
- Current interpretation is this criteria is for front-line workers and does not include administrative staff, corrections officers, etc.

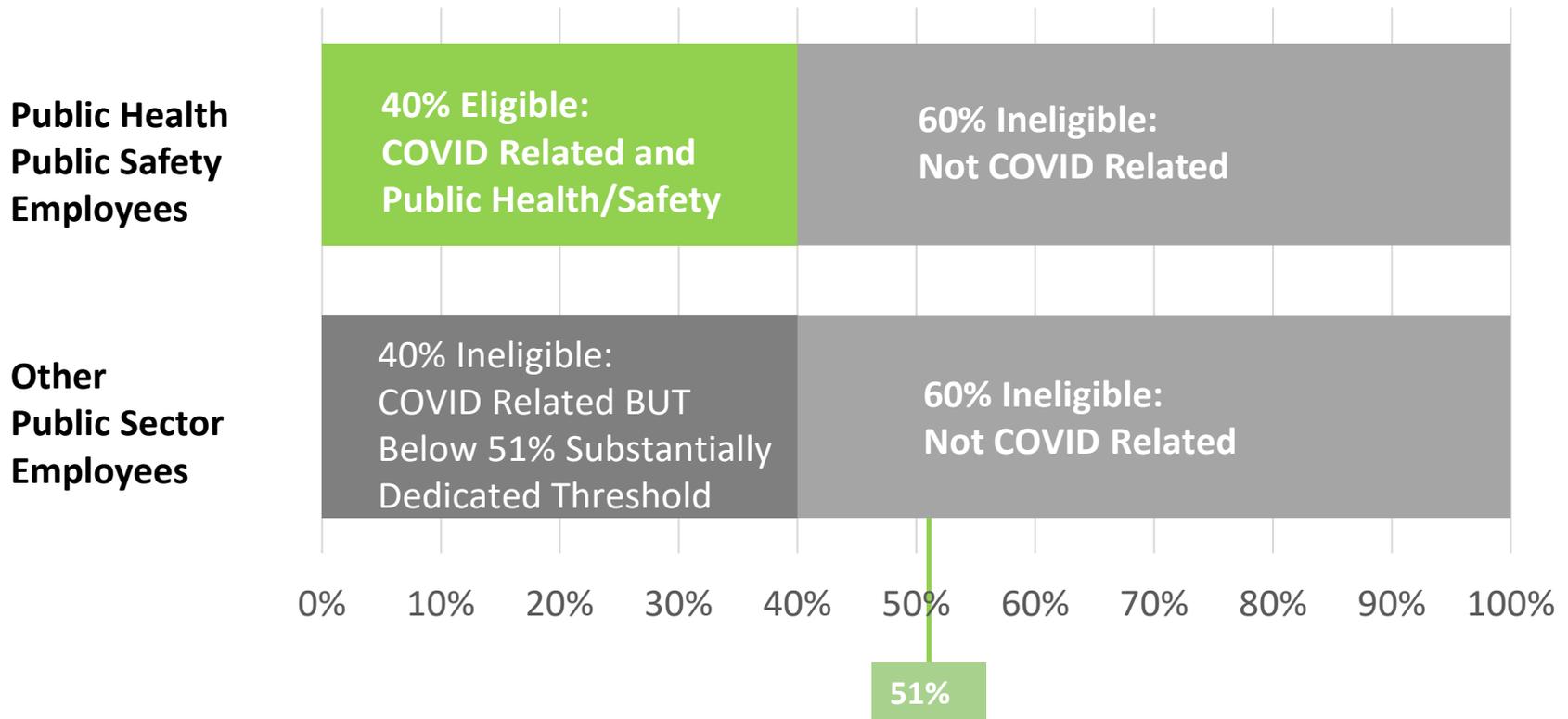
## **Hazard Pay**

- Allowed only for employees with increased hazardous work conditions



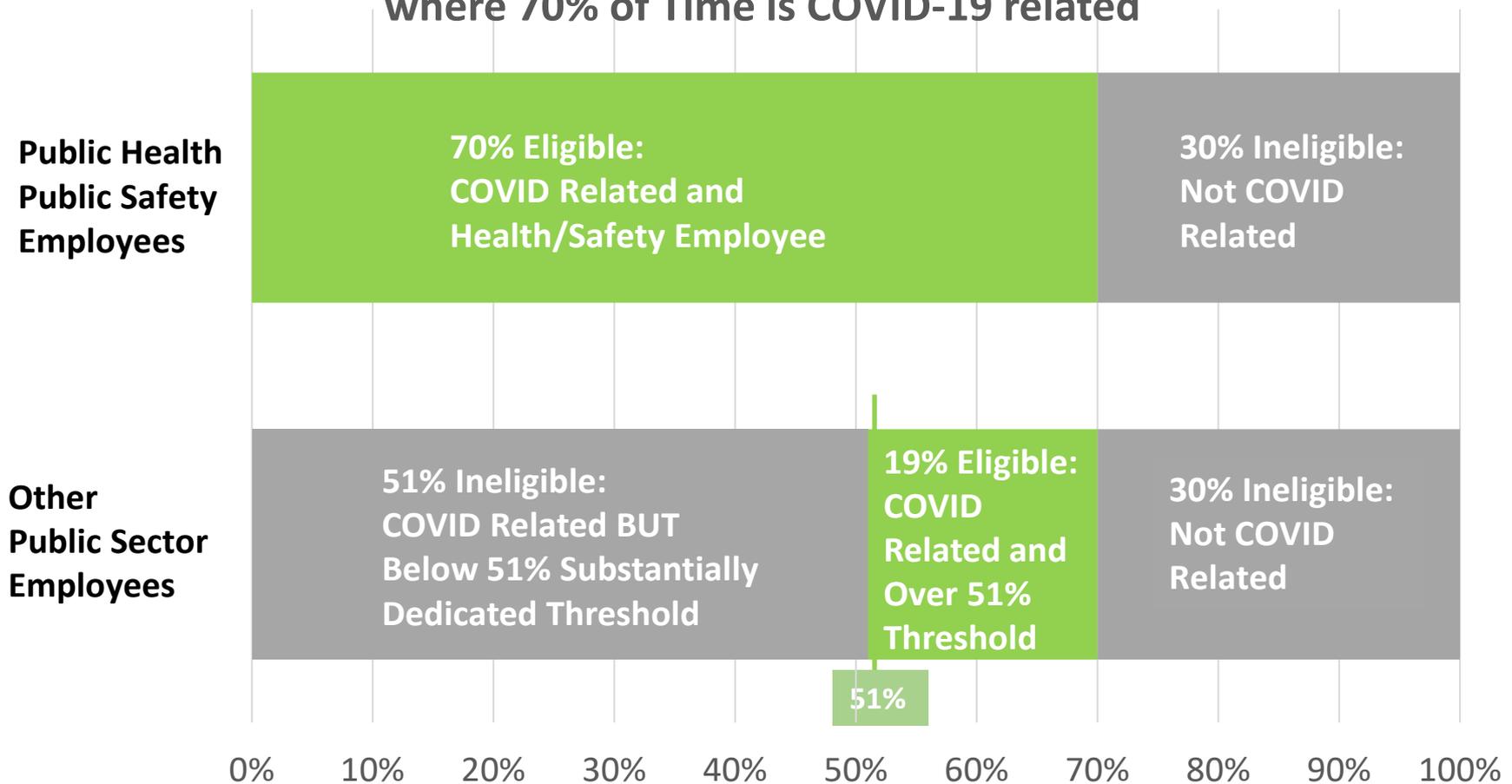
# ELIGIBLE PAYROLL EXPENSES

Example of Eligible Payroll Expenses  
where 40% of Time is COVID-19 related



# ELIGIBLE PAYROLL EXPENSES – TIGHT INTERPRETATION

## Example of Eligible Payroll Expenses where 70% of Time is COVID-19 related



# ADDITIONAL GUIDANCE ON ASSISTANCE PROGRAMS

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Local governments can set up assistance programs for people, businesses and non-profits.

Local governments need to discuss program framework with Bronner to ensure:

- Recipients are not duplicating benefits
- Funds are not used to pay the government (for instance, municipal utility bill forgiveness is not eligible.)
- Other requirements are met (for instance, Church/State constitutional requirements)



## GUIDANCE – COVID-19 RELATED CAPITAL IMPROVEMENTS

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- Capital improvements or alterations must have been necessary to prevent and mitigate the spread of COVID-19, such as touchless doors and trash cans.
- The capital project must begin to make an impact on preventing and mitigating the spread of COVID-19 by 12/30/20.
  - Design projects for future work are ineligible.
  - Projects that are not completed by 12/30 are ineligible
  - Payments for the work CAN take place after 12/30
- When determining how to use funds, consider the amount of risk reduction and the number of people who will benefit per dollar spent. Is the activity the most cost-effective approach?



## GUIDANCE - PREVIOUSLY BUDGETED

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- Only non-budgeted and above budgeted costs directly related to response and mitigation of the COVID-19 public health emergency are eligible.
- Expenses that were accounted for in the most recently approved budget as of 3/27/2020 are not eligible.
- If the cost increased due to COVID-19, the amount budgeted vs. the amount expended due to COVID-19 is eligible (i.e. COVID-19 related budget gap or “delta”)?
  - If specific components of a project were added because they were deemed necessary to prevent the spread or mitigate COVID-19, those components are eligible for reimbursement.
  - For instance, if computers were budgeted, but cameras and microphones were added to allow for work from home and virtual meetings.



# GUIDANCE ON TIME FRAME – CRF REQUIREMENTS

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## Overall CRF Time Frame

- Costs must be incurred between March 1, 2020 and December 30, 2020
- Payment can be made after Dec. 30, 2020 (should be paid within 90 days)
- Projects can be broken into segments. But the work completed by Dec. 30 can not be dependent on future work, for instance:
  - Cannot buy equipment to install after Dec. 30.
  - Cannot pay for design for construction that won't be completed before Dec. 30
- Activity and goods can have lasting value after Dec. 30, if reasonable and needed to address COVID-19

*While it is possible the timeframe will be extended, but do not plan that it will occur.*



# GUIDANCE ON TIME FRAME – WILL COUNTY REQUIREMENTS

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## Will County Local Government Time Frame

Program for local governments is divided into Phase 1 and future phase(s).

The application for reimbursements is now open

- This round of applications for reimbursement will only be accepted through Tuesday, September 8, 2020
- Entities may apply for expenses incurred by August 1, 2020
- The County seeks to approve reimbursement applications within 10 business days of receipt (additional time to make payment)

A future phase(s) will allow for reimbursement in later months

- Local Governments can develop plans for future activities and expenses based on funds allocated



## GUIDANCE - DUPLICATION OF BENEFITS

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The expense cannot be reimbursed directly or indirectly by another governmental or non-governmental source of funds

- You are not required to seek funding from other sources before spending CRF.
- CRF can be used as the FEMA Public Assistance 25% local match. Encouraged to apply for FEMA Public Assistance.
- Assistance programs must ensure recipients certify that they are not duplicating benefits.



# APPLICATION PROCESS

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# APPLICATION PROCESS: APPLYING

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Owner: Local Government Entity

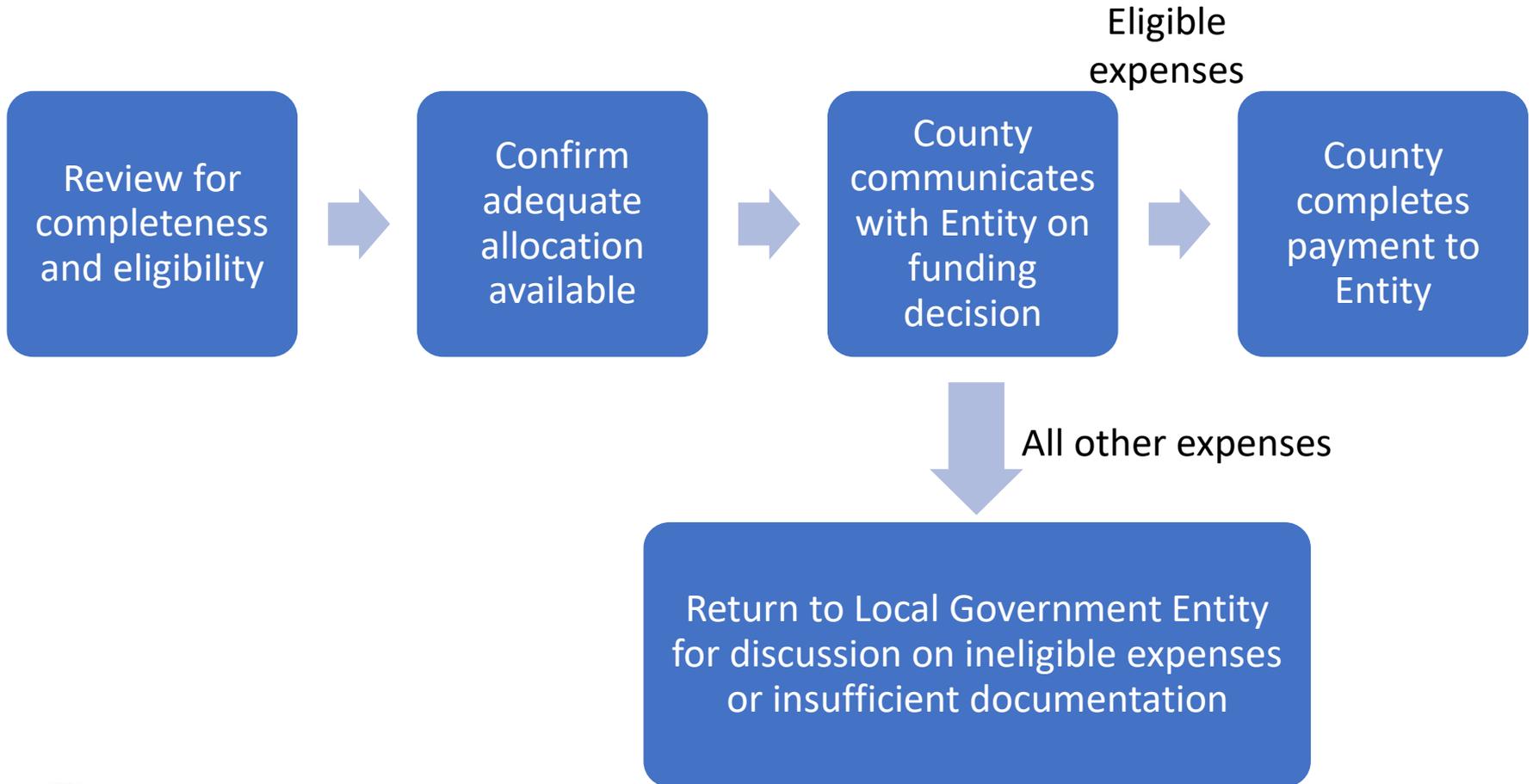


**Consolidation of expenditures into a single application is strongly encouraged** for administrative efficiency but a local government may submit as many funding request applications as needed up to its allocation.



# APPLICATION PROCESS: REVIEW

Owner: Will County and Bronner Group



# APPLICATION PROCESS

**THE APPLICATION OPENED ON AUGUST 10, 2020**

1. Navigate to the local government reimbursement application (URL below) and answer a series of background questions about the entity and the reimbursement request.

Please use the multi-select tool to identify all the types of expense within the application. There are 18 reporting categories as defined by the U.S. Treasury.

[www.willcountyllinois.com/CARES-Act/Local-Government-Assistance/Local-Government-Application](http://www.willcountyllinois.com/CARES-Act/Local-Government-Assistance/Local-Government-Application)



# ELIGIBLE EXPENDITURES (REPORTING CATEGORIES)

## CRF CAN ONLY PAY FOR ELIGIBLE COSTS:

### Expenditure Categories:

- a. Administrative Expenses
- b. Budgeted Personnel and Services Diverted to a Substantially Different Use
- c. COVID-19 Testing and Contact Tracing
- d. Economic Support (Other than Small Business, Housing, and Food Assistance)
- e. Expenses Associated with the Issuance of Tax Anticipation Notes
- f. Facilitating Distance Learning
- g. Food Programs
- h. Housing Support
- i. Improve Telework Capabilities of Public Employees
- j. Medical Expenses
- k. Nursing Home Assistance
- l. Payroll for Public Health and Safety Employees
- m. Personal Protective Equipment
- n. Public Health Expenses
- o. Small Business Assistance
- p. Unemployment Benefits
- q. Workers' Compensation
- r. Items Not Listed Above - to include other eligible expenses that are not captured in the available expenditure categories



# APPLICATION PROCESS

2. Provide completed *Summary of Reimbursements* spreadsheet.
  - Provide description of each activity in the “Summary of Reimbursements” spreadsheet that shows how the expense is related to COVID response and recovery and the amount spent.
  - Expenses must be broken out into the 18 different reporting categories.
  - Populate the cells highlighted yellow across all tabs where you have a relevant reimbursement request.
  - **Add additional rows within each section as needed** to provide sufficient detail of the eligible activity. Prefer to have expenses broken out as much as possible.

	A	B	C
1			
2	<b>Name of Municipality/District:</b>	City of Oz	
3	<b>Category of Spending</b>	<b>Description of Activity</b>	<b>Total Amount</b>
31	n. Public Health Expenses (e.g. implementation of public health directives, such as enforcing stay-at-home orders, disinfecting public spaces, quarantine, and public health technical assistance)	Personal Protective Gear	\$500.00
32		Cleaning supplies (sanitizer, wipes, sprays)	\$150.00
33		Paid sick leave to comply with COVID	\$5,000.00
34			

Additional rows added for each eligible activity



# APPLICATION PROCESS

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3. Provide supporting documentation of the expenses as PDF documents.
  - Use the row number on the *Summary of Reimbursements* spreadsheet to link the activity with the PDF documentation. **Please make it as easy as possible to link the supporting documentation to the PDF.**
  - If there is more than one page of receipts and support, please provide a header page that uses the row number on the *Summary of Reimbursements*
  - It is important that the invoice or related documentation clearly displays that the expense was due to the COVID-19 public health emergency.
  - Invoice receipts should be clearly dated to show the cost was not incurred before March 1, 2020
  - For payroll costs, provide report(s) that indicate the person, the payroll period, the time spent working on COVID related projects, and the rate of pay including if the rate is straight time/overtime/hazard pay
  - If more than \$50,000 was spent on any activity, more detailed information is required



# APPLICATION PROCESS

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4. The Chief Executive Officer, the Chief Financial Officer or equivalent executive with authority to certify, must sign the *Coronavirus Relief Fund Acceptance Certification*.
  - **The certification must be notarized.** A PDF copy of the notarized document should be submitted with the application.
  - The fully executed and notarized certification should also be mailed to Will County. The address is listed on the form.
5. Copy of FEMA Public Assistance Program reimbursable expenses, if submitted.
6. A completed copy of a W-9 is required for the initial application.
7. Those that would like to receive the reimbursement payment via an electronic ACH payment must also submit
  - Completed *Direct Deposit/ACH Form*
  - A cancelled check (PDF version)



# SUMMARY OF REQUIRED DOCUMENTS

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All local government entities must submit the following documents to receive reimbursement:

1. *Summary of Reimbursement* spreadsheet filled out with all expenses and an accompanying short description for each expense
2. Supporting documents in PDF format **for each expense** being requested for reimbursement
3. Signed and **notarized** copy of the *Coronavirus Relief Fund Acceptance Certification*. A scanned PDF copy must be submitted with the application online. The original must be sent to the county by mail
4. W-9 Form
5. *Direct Deposit/ACH form* if you wish to receive electronic ACH payment
6. Scanned copy of a cancelled check if you wish to receive electronic ACH payment
7. Copy of FEMA Public Assistance Program reimbursable expenses, if submitted



# APPLICATION TIMELINE & NEXT STEPS

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The application is open

- This round of applications for reimbursement will only be accepted through Tuesday, September 8, 2020
- Entities may apply for expenses incurred by August 1, 2020
- The County seeks to approve reimbursement applications within 10 business days of receipt (additional time to make payment)

The County anticipates a second application period to allow for reimbursement in later months

- Please reach out to the County or Bronner Group ahead of time to discuss large projects that are anticipated for the reimbursement period (through Dec 30)
- For example, eligible capital improvement projects and economic assistance programs

Federal legislation is being negotiated that would provide additional flexibility on CARES Act funding.



# REPORTING REQUIREMENTS

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- All recipients are subject to audit and additional documentation must be provided upon request.
- Will County reserves the right to conduct an audit of local government CRF reimbursements for consistency with U.S. Department of the Treasury Guidelines:

<https://home.treasury.gov/policy-issues/cares/state-and-local-governments>

- All CRF expenditures should be tracked on a quarterly basis for the full funding lifecycle, i.e. until the CRF allocation has been fully utilized and goods/services delivered.



## RECORD RETENTION (PAGE 1)

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“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. receipts of purchases made related to addressing the public health emergency due to COVID-19;



## RECORD RETENTION (PAGE 2)

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

6. contracts and subcontracts entered into using Coronavirus Relief Fund payments and all documents related to such contracts;
7. grant agreements and grant subaward agreements entered into using Coronavirus Relief Fund payments and all documents related to such awards;
8. all documentation of reports, audits, and other monitoring of contractors, including subcontractors, and grant recipient and subrecipients;
9. **all documentation supporting the performance outcomes** of contracts, subcontracts, grant awards, and grant recipient subawards;
10. **all internal and external email/electronic communications** related to use of Coronavirus Relief Fund payments; and
11. all investigative files and inquiry reports involving Coronavirus Relief Fund payments.



# APPLICATION SUPPORT

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Questions about the application can be sent to [caresgov@willcountyillinois.com](mailto:caresgov@willcountyillinois.com)



# RESOURCES

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## US Department of the Treasury (USDT)

- [CARES Act website for State and Local Government](#)
- [CRF Program Guidelines as of 6/30](#)
- [CRF Frequently Asked Questions as of 8/10](#)
- [Treasury OIG CRF Record Retention and Reporting Requirements as of 7/2](#)
- [Treasury OIG CRF Reporting Requirements Update as of 7/31](#)

## Centers for Disease Control and Prevention (CDC)

- [COVID-19 website](#)
- [COVID-19 Interim Guidance for Businesses and Employers](#)
- [COVID-19 Employer Information for Office Buildings](#)

## Federal Emergency Management Agency (FEMA)

- [COVID-19 website](#)
- [Public Assistance website](#)

## Pandemic Response Accountability Committee (PRAC)

- [Main website](#)
- [Report COVID-19 related Fraud, Waste, or Abuse](#)

## State of Illinois Coronavirus Resources

- [Main website](#)

## National Association of Counties (NACo)

- [Coronavirus Relief Fund website](#)

## International City/County Management Association

- [Coronavirus Crisis Response Resources](#)



# QUESTIONS

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