



STATE OF CONNECTICUT

OFFICE OF POLICY AND MANAGEMENT

Intergovernmental Policy and Planning Division

MUNICIPAL CRF PROGRAM Q & A Updated October 9, 2020

Please refer to the website for portal instructions,
allowable expenses and other materials

<https://portal.ct.gov/OPM/Coronavirus/Coronavirus-Relief-Fund/Municipal-CRF-Program>

- **March 1 – June 30th Claim Period Deadline:**
 - Extension to October 30, 2020 to file
 - This is the final extension for this claim period
- **FEMA Acceptance:**
 - The CRF Program does not need a FEMA denial in order to submit your claim. However, you must claim eligible items to FEMA.
 - Refer to FEMA guidance information for eligible items on Municipal CRF Program website as well as Attachment A.
 - If applying for 25% reimbursement, your FEMA approval letter must be submitted with your claim.
 - Note that a denial by FEMA does not automatically make the claim eligible for CRF. It must meet the requirements of CRF.
 - If you have not heard back from FEMA with an acceptance letter by our claim period close, you should submit just your non-eligible FEMA items to the Municipal CRF Program. You will not be able to claim the 25% reimbursement for your FEMA claim.
- **Uploading your claim data:**
 - You can enter invoices at any time as they can be edited/removed.
 - Do not finalize (submit/certify) your claim until you are completely done.
- **Certification and Filing Claim:**
 - Do not submit your final claim until you have entered all invoices for the claim period.
 - Once you submit and certify the claim, you cannot adjust or edit invoices or claim.

- **Document uploads:**

- FEMA Approval Letter indicating approval amounts. This is not an email; it is an actual letter:

Award Letter



U.S. Department of Homeland Security
Washington, D.C. 20472



- Transaction Detail from your municipal finance system (i.e. MUNIS check register)
 - No invoices or additional documents should be uploaded.
 - Documents only accepted in PDF format.
- **Overtime Claims – Batch versus Individual:**
 - **When entering overtime in the CRF claim, can we enter by pay period batch or individual?** By pay period batch if the municipality payroll system has a unique code to track overtime related to COVID-19.
 - **Force Account overtime for FEMA:** You need the individual's name, hours worked, date worked, hourly rate, and fringe rate and total cost claimed are captured on the FA Labor Summary. Generally, this is supported by either individual timesheets or a payroll report with hours claimed highlighted this is used by FEMA to verify all claimed costs on the summary sheet

BATCH PAYROLL:

Only if the municipality payroll system has a unique code to track overtime related to COVID-19.

- Name of Payee/Vendor/Contractor – Municipality Name
- Date of Payee Invoice – Payroll Batch Date (i.e. week ending date for the pay week)
- Actual Date Goods and/or Services Received – Payroll Date
- Date of Grantee Payment to Payee – Payroll Date
- Grantee Check Number – Enter first or last check # of payroll period
- Category – Hazard Pay or Overtime Related to Overtime Related to Response
- Will need to include payroll log as part of transactional detail upload

INDIVIDUAL PAYROLL:

- Name of Payee/Vendor/Contractor – Individual Name
- Date of Payee Invoice – Payroll Date (i.e. week ending date for the pay week)

- Actual Date Goods and/or Services Received – Payroll Date
 - Date of Grantee Payment to Payee – Payroll Date
 - Grantee Check Number – Individual's payroll check number
 - Category - Hazard Pay or Overtime Related to Overtime Related to Response
 - Will need to include payroll log as part of transactional detail upload
- **We ordered PPE and distancing supplies in late June. The invoices didn't get in until July and dated in July. Since we ordered them in June, we can claim those invoices for 3/1/20-6/30/20 period reimbursement, right?** No, the invoice needs to be dated prior to June 30, 2020.
 - **What Catalogue of Federal Domestic Assistance (CFDA) number should we use on our Single Audit reports for reimbursements under the CRF program?** CFDA# for CRF is 21.019
 - **In order to mitigate the loss of tax revenues, we started absorbing fees for online tax payments. Can we submit these credit/debit/ACH fees for reimbursement through CRF?** As this is tied to revenues, it is not considered an eligible expense.
 - **Can we bundle categories of expenditures so that we don't have to enter hundreds of "Invoices" in the OPM Portal? For instance, can we enter an invoice for FEMA-eligible and approved "Supplies" and enter the total amount along with the upload from our financial management software that ties to the total as a single item?** The Muni CRF Program requires invoices to be entered individually. The Program will allow you to re-enter the same invoice if such invoice has expenditures for more than one category.
 - **If these must be entered as several individual "Invoices", is it possible to do an import from Excel to get them into the Portal and then upload supporting documentation in order to cut down on some of the data entry?** OPM is only accepting a Transactional Detail Report from your municipal system.
 - **How should we reflect items that were paid by purchase card rather than a Check or ACH?** The vendor would be the purchase card company/bank and the when the statement is paid will provide the payment information for submission. All submissions must have a check # to match the transactional report.
 - **If we hired a Seasonal/Temporary employee just to enforce social distancing measures at the municipal golf course, can his/her regular wages be reimbursed under CRF? We will check the eligibility of this with FEMA first, but if FEMA doesn't deem it an eligible expenditure, can we be reimbursed through CRF?** The key to this eligibility question would be what type of work the temporary worker doing. If that work is responding to the COVID emergency such as a temporary worker engaged in COVID Medical response, or installation or

implementation of COVID prevention measures, that time/cost would likely be considered Cat B FEMA eligible cost. If the temporary worker was meeting the requirement of normal government operations, road repairs, regular building maintenance etc. the costs would not be considered FEMA Cat B eligible.

- **If we hired a Seasonal/Temporary employee just to schedule appointments for citizens to conduct business at City buildings prior to fully opening up City buildings to all traffic from citizens, can his/her regular wages be reimbursed under CRF?** The key to this eligibility question would be what type of work the temporary worker doing. If that work is responding to the COVID emergency such as a temporary worker engaged in COVID Medical response, or installation or implementation of COVID prevention measures, that time/cost would likely be considered Cat B FEMA eligible cost. If the temporary worker was meeting the requirement of normal government operations, road repairs, regular building maintenance etc. the costs would not be considered FEMA Cat B eligible.
- **Are there different time periods for CRF and FEMA?** Yes, each Federal program has different eligibility dates. CRF is for the period March 1, 2020 through December 30, 2020. FEMA incident period began January 20, 2020. And end date has not been established yet.
- **Can Boards of Education apply for FEMA?** Yes, but there are separate guidelines for the funding stream order for local and regional Boards of Educations. See the Funding Guide (Attachment B) at the end of the document.
- **Our Probate Court will be going to full staff capacity and we will need to rent extra space as we do not have space to house them within the guidelines. Is the rent reimbursable?** The increased operating cost is not FEMA or CRF eligible.
- **Office modifications are an allowable reimbursement. Can you clarify what a full rebuild is?** Full rebuilds where a lower cost option is available will not be funded.
- **Where can I find Federal eligibility guidance on the CRF?**
<https://home.treasury.gov/policy-issues/cares/state-and-local-governments>
- **Is fuel liquidation/unused fuel expense eligible?** As this is a budgeted expense, it is not eligible.
- **Are additional unemployment costs eligible?** Unemployment is not eligible. The Department of Labor may have available programs.
- **Is committing fund balance from current year surplus for COVID-19 expenditures next year be considered budgeted expenditures?** Yes, it would be considered as budgeted expenditures.

ATTACHMENT A

This is for guidance only and below information does not comprise a final eligibility decision concerning specific Public Assistance projects or activities. FEMA only provides such eligibility decisions through formal, written determinations through the Public Assistance application process. Furthermore, FEMA is currently preparing a policy document concerning the eligibility of work and costs under Public Assistance Category B for COVID-19 and, as a result, the preliminary and nonbinding guidance below may change.

- 1. *Disinfection of Schools and Other Public Facilities.*** You have asked whether the disinfection of school and other government buildings (including purchase and provision of necessary supplies and equipment) would be eligible under Public Assistance Category B. The answer is likely no. FEMA will provide financial assistance for disinfecting public facilities only when that public facility is performing eligible emergency protective measures and it is necessary to disinfect that public facility to facilitate that eligible work. Please see chart below for more detail.
- 2. *Personal Protective Equipment (PPE) for Government Employees.*** You have asked whether the purchase of PPE (e.g., N95 masks, cloth face coverings, aprons, face shields, etc.) for schoolteachers, election poll workers, town or city clerks, public works employees, medical staff, and all other government employees to perform their day-to-day duties would be eligible. The answer is likely no. FEMA will only provide financial assistance for an applicant to purchase PPE for government employees when an employee is performing an eligible emergency protective measure and needs the PPE to facilitate that eligible work.
- 3. *Temperature Screening and Other Measures in a Public Facility.*** You have asked whether the purchase of thermometers for temperature screening and installation of temporary physical barriers (such as plexiglass barriers) and other temporary measures in a public facility to help prevent the spread and transmission of COVID-19 in that facility would be eligible under Public Assistance Category B. The answer is likely no. FEMA will only provide financial assistance for temperature screening and temporary physical barriers and other temporary measures in a public facility where an employee is performing eligible emergency protective measures and needs the PPE to facilitate that eligible work.
- 4. *Face Masks for the Public.*** You have asked whether the purchase of face masks (including cloth facial coverings, costs of distribution, and storage space) would be eligible under Public Assistance Category B. The answer is likely no. FEMA will only provide financial assistance for an applicant to purchase cloth face masks for government employees when an employee is performing an eligibility protective measure and needs the face mask to facilitate that work.
- 5. *Testing.*** You have asked whether the testing of members of the public would be eligible under Public Assistance Category B. The answer is likely no. FEMA will only provide financial assistance for testing performed by an eligible applicant (such as a local government hospital) in the provision of medical care.

	Description Cleaning and Disinfecting	Eligible
1	Disinfecting a building that has been closed or unoccupied	No
2	Disinfecting outdoor facilities that receive direct sunlight	No
3	Disinfecting an open and occupied facility required as a result of a suspected or positive case of COVID-19	Yes
4	Disinfecting a facility as part of the normal operating costs of a facility	No
5	<p>Disinfecting a facility as part of the normal operating costs of a facility where:</p> <ul style="list-style-type: none"> - The facility provides services that are specifically related to eligible emergency actions to save lives or protect public health and safety or improved property; - The costs are for a limited time based on the exigency of the circumstances; and - The Applicant tracks and documents the additional costs <p>(Note: Examples may include increased cleaning and disinfection costs in emergency, medical, and custodial care facilities where individuals may be infected with COVID-19, as well as facilities where otherwise PA eligible emergency protective measures are being performed, such as non-congregate shelters or emergency operations centers.</p>	Yes

ATTACHMENT B

FUNDING GUIDE

Municipality (non-education related) Relief Funding:

- Apply first to FEMA
- Apply to Department of Public Health for local health districts
- Apply to Department of Housing Small Cities CDBG and ESG Funding for sheltering and congregate housing
- Apply last to CRF

Educational Funding Relief for Municipal Boards of Education:

- Apply to CSDE first for ESSERF
- Whatever is not covered by ESSERF, should be submitted to the municipality so they can then submit those uncovered costs to FEMA, then CRF on behalf of the Board of Ed

Educational Funding Relief for Non-Municipal Boards of Ed (Regional or private schools)

- Apply to CSDE first for ESSERF
- Then the educational institution will apply DIRECTLY to FEMA (does not apply through a muni)