

Coronavirus Relief Fund Frequently Asked Questions for Government Entities

December 18, 2020¹

NOTE: The federal Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, enacted on December 27, 2020, extends the covered period for using Coronavirus Relief Fund (CRF) moneys. The new deadline is December 31, 2021. NCPRO is in the process of reviewing and updating CRF guidance to reflect changes. Please be aware that any references to the deadline in this document may be out of date unless otherwise noted. No changes have been made to the allowable uses of funds.

Purpose

The North Carolina Pandemic Recovery Office (NCPRO) provides technical assistance to Coronavirus Relief Fund (CRF) recipients, including public universities, local governments, and state agencies. NCPRO understands that this is a particularly overwhelming time for communities across the state. To help you navigate the existing US Treasury guidance and the NCPRO reporting requirements, the team has compiled this document of frequently asked questions. You can also send inquiries to us at NCPRO@osbm.nc.gov.

Please note that this information is provided as a reference and is current as of November 23, 2020. Unless otherwise specified, all references to US Treasury guidance refer to the following two documents:

- [Coronavirus Relief Fund Guidance for State, Territorial, Local, and Tribal Governments](#)
- [Coronavirus Relief Fund Frequently Asked Questions](#)

The US Treasury Office of the Inspector General also documents [CARES Act reporting and record-keeping information here](#).

¹ Updated on August 28, 2020 to fix typos in questions 5.6 and 5.7. Updated on September 16, 2020 to correct typos, clarify the NCPRO reporting process, and reflect changes made to US Treasury guidance on September 2. The following sections of this document were modified: 2.1 (flow chart), 2.2f, 2.2n, 2.2t, 5.1, 5.2, 5.4, 5.5, 5.8. Updated on November 23 to reflect updated US Treasury guidance and include all publicly funded entities, including public universities and state agencies. The following sections were modified or added: 1.3, 2.2a, 2.2c, 2.2f, 2.2h, 2.2n, 2.2t, 2.2u, 2.2v, 2.2w, 2.3c, 4.4, 4.5, 5.1, and 5.3.

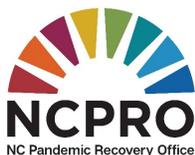
This information is not exhaustive. We know this doesn't cover every situation that you may face. In the event of a conflict between this document and state law, federal law, or US Treasury guidance, the state and federal laws and guidance supersede this document.



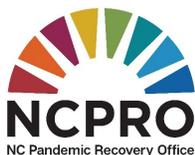
Website: <https://ncpro.nc.gov>
Email: NCPRO@osbm.nc.gov

Frequently Asked Questions

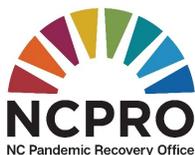
- 1 Receipt of Funds..... 6
 - 1.1 How do counties apply for funds?..... 6
 - 1.2 Does the municipality receive their funds directly? 7
 - 1.3 Is there a methodology or formula for counties to use in sharing a portion of their allocation with municipalities? 7
 - 1.4 What are plans? 7
 - 1.4a Can plans be modified? 8
 - 1.4b Where do I find my specific upload link? 8
- 2 Use of Funds..... 9
 - 2.1 We want to use our CRF allocation! What are eligible expenses? 9
 - 2.1a When is a cost incurred? What about encumbered funds?..... 9
 - 2.1b What is the “most recently approved” budget? How do adjustment, amendment, or supplemental appropriations affect the use of CRF funds?..... 10
 - 2.1c What constitutes “substantially different use” of funds? 10
 - 2.2 Questions about specific eligible expenses:..... 10
 - 2.2a Prepayment 10
 - 2.2b Reimbursement 11
 - 2.2c Administration costs 11
 - 2.2d Temporary COVID-19 specific grant manager 11
 - 2.2e Audit expenses..... 11
 - 2.2f Payroll expenses 11
 - 2.2g Equipment time 13
 - 2.2h Ambulances and similar vehicles..... 13
 - 2.2i Cleaning government buildings and facilities 13
 - 2.2j Park reservation refunds 13
 - 2.2k Business loan programs 13
 - 2.2l Business grant programs 14
 - 2.2m Government-administered grant programs 14
 - 2.2n Local Education Agency (LEA) expenses 14
 - 2.2o Telework equipment..... 14
 - 2.2p Hurricane and future public health disasters 14
 - 2.2q Utilities 14



2.2r	Emergency financial assistance (including rent, mortgage)	15
2.2s	Childcare assistance	15
2.2t	Critical public health infrastructure upgrades	15
2.2u	Are public university student refunds for tuition, room and board, meal plans and activity fees eligible CRF expenditures?	15
2.2v	What happens if a vendor cannot deliver a good or service before December 30, 2020?	15
2.2w	What if a vendor cannot guarantee a delivery date prior to December 30?	16
2.3	FEMA	16
2.3a	Can CRF funds be used to match other federal funds?	16
2.3b	We know that CRF funds cannot be used to pay for expenses incurred prior to March 1, 2020. Can we seek FEMA reimbursement for expenses incurred prior to March 1st?	17
2.3c	Are we required to apply for FEMA reimbursement before paying for an eligible expense with CRF funds?	17
2.3d	Will receiving CRF funds impact or limit the amount of FEMA Category B reimbursement that government entities (and other potential sub-subrecipients) are eligible for?	17
3	Compliance	18
3.1	Are these dollars considered State funds or federal funds, and are there any special accounting requirements?	18
3.2	Are CRF payments considered federal financial assistance for purposes of the Single Audit Act?	18
3.3	Are Fund payments subject to other requirements of the Uniform Guidance?	18
3.4	Is a municipality liable for ineligible expenditures?	18
4	Accounting	19
4.1	What is the CFDA number for these federal funds?	19
4.2	Has the NC Treasury issued any guidance on accounting practices?	19
4.3	What happens to the interest earned on CRF monies?	19
4.4	How long can an entity retain funds to pay for delayed goods or services?	19
4.5	Are entities allowed to pay for non-delayed goods or services beyond December 30, 2020?	19
5	NCPRO Reporting Requirements	20
5.1	When must local governments and sub-recipients report expenditures each month?	20
5.2	What documents are required for entities and sub-recipients for the monthly reports to NCPRO?	20



Attachment C-1: Descriptive summary of how CRF were used, any deliverables, progress against objectives & expected outcomes	21
Examples of performance metrics	21
Attachment C-2: Monthly report of expenditures for recipients and sub-recipients by cost category	22
Supporting documentation	23
5.3 When do we submit Attachment F?.....	24
Attachment F: Grant outcomes and accomplishments final report.....	24
5.4 NCPRO Document Submission.....	25
5.4a Important! Naming conventions	25
5.4b Correcting errors.....	25
5.5 How do I report expenditures between March 1 and June 30?	25
5.6 How do we handle final reporting if we have outstanding invoices?	25
5.7 What documentation must a local government retain for audit purposes?	25
5.8 Additional requirements for vendors and sub-recipients paid \$50,000 or more.....	26

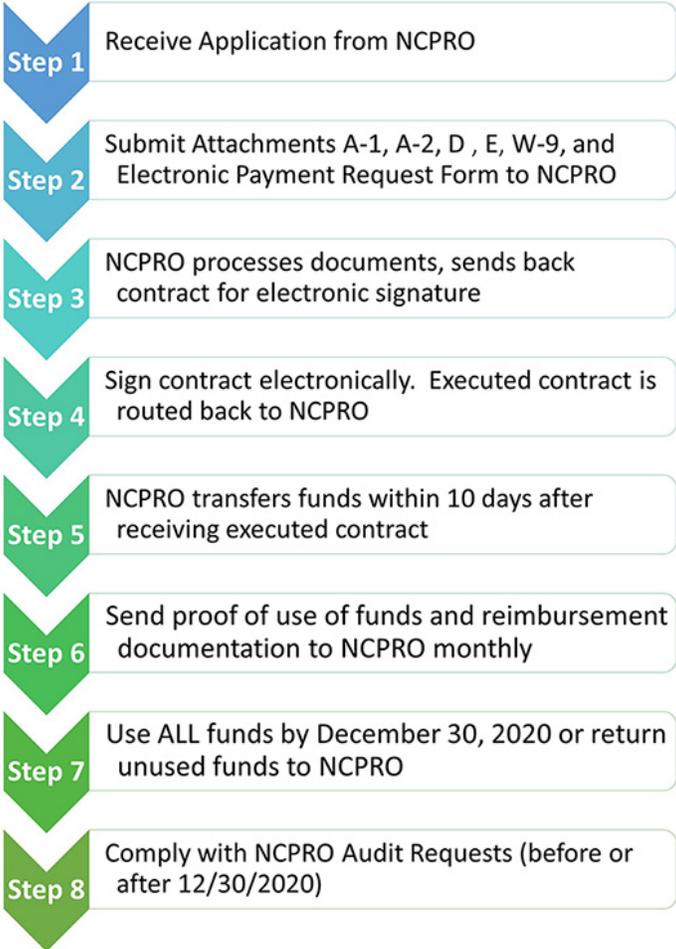


1 Receipt of Funds

The federal Coronavirus Aid, Relief, and Economic Security (CARES) Act included over \$4 billion of the Coronavirus Relief Fund (CRF) to North Carolina. The General Assembly had the responsibility of appropriating the state’s CRF allocation. The General Assembly passed a number of separate pieces of legislation that appropriated CRF. All CRF available to the State have now been appropriated. NCPRO is responsible for administering, auditing and reporting on the use of these funds. All CRF allocations are also subject to state and federal audit.

1.1 How do counties apply for funds?

For the first round of allocations, counties submitted applications to NCPRO. Applications were not required for the second round. For reference, this was the application process for the first round of funds to counties:



1.2 Does the municipality receive their funds directly?

No. Counties are each apportioned funds to address the COVID-19 public health emergency in their jurisdiction. [Session Law 2020-80](#) has directed that Counties must pass no less than 25% of their total appropriation on to municipalities within their jurisdiction.

1.3 Is there a methodology or formula for counties to use in sharing a portion of their allocation with municipalities?

Apart from mandating that counties must provide a minimum of 25% of their allocation to the municipalities within their county, there are no formulas or criteria mandated by the General Assembly. All municipalities must use the funds in accordance with the U.S. Treasury guidelines.

1.4 What are plans?

All local governments receiving CRF dollars must submit plans identifying the intended use of CRF dollars. Counties have already submitted their initial plans based on the first round of allocations. With the second round of allocations, counties must now submit amended plans based on their total allocated amount. In addition, municipalities must now submit plans to their counties by September 1. [S.L. 2020-80](#) directs that “If a municipality that receives funds under this subdivision does not have a plan to spend the funds developed by September 1, 2020, the municipality shall return the funds to the county for use by the county or redistribution to other municipalities within the county.”

**North Carolina Pandemic Recovery Office
Coronavirus Relief Fund (CRF)
County Plan**

Instructions

- This document is to be used by counties to document the planned use of the CRF monies allotted in Session Law 2020-4.
- Please add the name of your county instead of the county name below: "North County CRF plan"
- Submit your plan to NCPRO@osbm.nc.gov or before June 30, 2020.
- Under Categories, please aggregate the amount of all expenses for that specific category, keep amounts as close as possible and you can enter the county amount. The total must agree with your allotment.

The County is responsible for maintaining adequate documentation to support expenditures. If estimates are being used the methodology must be documented and defensible. The County is responsible for following the Federal Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards promulgated by the United States Office of Management and Budget unless the US Treasury publishes guidance stating otherwise.

County Information

Name of County: _____
 Person Submitting: _____
 Title: _____
 Email: _____
 Phone Number: _____

See the below table for county and municipality instructions.

Submitted plans can be viewed on the [NCPRO website](#). Please be patient as we work to update the website with amended plans.

	County	Municipality
Where to access the plan template	County CRF Plan Template	Municipalities may amend the county template, or use the modified Municipality CRF Plan Template
How to submit a plan	Submit county and municipality plans to NCPRO via county-specific upload link	Email to your county. Your county will submit municipal plans to NCPRO via their county-specific upload link
Deadline to submit (amended) plan	September 15, 2020	September 1, 2020

1.4a Can plans be modified?

Yes. We understand that this is an evolving and unique situation. Plans may change as you continue to assess how best to serve your residents. To amend a plan, make the relevant changes to the previously submitted document. Please follow the naming conventions below:

Important! Naming conventions

All documents submitted using the entity-specific upload links should begin with the corresponding agreement number (for example, 02-01). Counties should assign agreement numbers to municipalities (for example, 02-01-01 Town ABC, 02-01-02 Town DEF, 02-01-03 City XYZ).

Documents uploaded with identical titles to previously uploaded document will replace existing document. Please include the word “Amended” at the end of updated CRF plan title.

1.4b Where do I find my specific upload link?

Link were previously emailed to all entities. If you need the link re-sent, please email us at NCPRO@osbm.nc.gov.



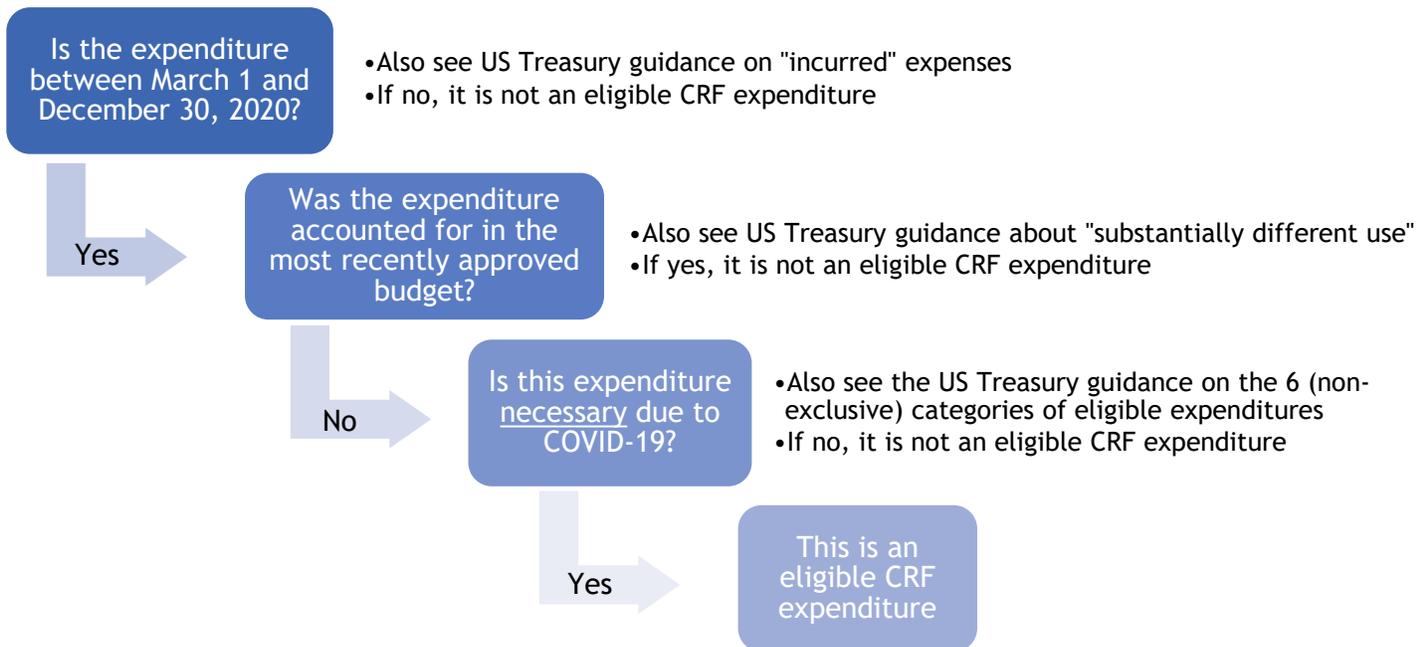
2 Use of Funds

2.1 We want to use our CRF allocation! What are eligible expenses?

Great question. This is the place to start. The CARES Act provides several criteria for determining eligible expenses:

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 government; and
3. were incurred during the period that begins on March 1, 2020, and ends on December 30, 2020.²

When determining eligible CRF expenditures, one should determine whether all three conditions are met. For more information on each of these criteria, the US Treasury provides [guidance](#) and [frequently asked questions](#) for counties and local governments. NCPRO follows this process when providing guidance to CRF recipients. If you're more flow-chart oriented, here's a graphic to guide you as you assess eligible expenditures:



2.1a When is a cost incurred? What about encumbered funds?

For a cost to be considered to have been incurred, performance or delivery must occur during the covered period, but payment of funds need not be made during that time. For example, a government entity may purchase PPE and receive an invoice for said PPE on December 15th 2020, receive the PPE in January and pay for the PPE at the time of delivery in January and the expenditure will be eligible.

2.1b What is the “most recently approved” budget? How do adjustment, amendment, or supplemental appropriations affect the use of CRF funds?

The “most recently approved” budget refers to the enacted budget for the relevant fiscal period for your government entity, without taking into account subsequent supplemental appropriations or other budgetary adjustments, or amendments made in response to COVID-19.

If your government made budget adjustments, amendments or supplemental appropriations prior to or after March 27, 2020, CRF funds can be used for those adjustments, amendments, or supplemental appropriations as long as the expenditures meet these two requirements: (1) It was a necessary expenditure incurred between March 1 and December 30, 2020 and (2) it was mitigating COVID-19.

2.1c What constitutes “substantially different use” of funds?

Based on the US Treasury guidance, costs incurred for a “substantially different use” include, but are not limited to, costs of personnel and services that were budgeted for in the most recently approved budget but which, due entirely to the COVID-19 public health emergency, have been diverted to substantially different functions. Employees whose salary were budgeted but have stopped performing their usual job duties and are reassigned or redeployed to different job duties related to COVID-19 would be considered “substantially different use.” Examples of “substantially different use” include:

- ✓ An auditor stops auditing and is reassigned as the Grant Coordinator for COVID-19 funding - this is a substantially different use.
- ✓ Parks are closed so park employees are redeployed to work in the county buildings sanitizing common areas - this is a substantially different use.
- ✗ A budget analyst that is reassigned to work on COVID-19 budget work is not a substantially different use since the employee continues to perform budget work.
- ✗ A park employee who normally provides in-person tours is providing virtual tours instead. This is not a substantially different use of the employee.

2.2 Questions about specific eligible expenses:

What about...

2.2a Prepayment

A government should not make prepayments on contracts using payments from the Fund to the extent that doing so would not be consistent with its ordinary course policies and procedures. For example, payroll expenses are not typically pre-paid, so governments should not prepay such expenses using CRF dollars. In contrast, software contracts are often pre-paid. Necessary expenditures on software may therefore be pre-paid as long as doing so is usual or standard; that is, if a software license is for a period of one year for all purchasers and there is not an alternative, that is



acceptable. Note that additional or ongoing support services for such purchases can only be paid for with CRF during the covered period.

2.2b Reimbursement

CRF monies can be used to reimburse entities for expenses already incurred dating back to March 1, 2020, provided the expenses meet the other requirements for use of CRF dollars.

2.2c Administration costs

Unlike other federal grants, you cannot charge a flat or indirect cost rate. This is true for sub-recipients and grantees, as well. Administration costs are only allowable as direct costs that are clearly related to COVID-19.

What about administrative staff?

In its September 2, 2020 guidance, the US Treasury indicated that some administrative staff are presumed to be substantially dedicated

- Public safety employees: "...those who directly support such employees such as dispatchers and supervisory personnel."
- Public health employees: "...employees of public health departments directly engaged in matters related to public health and related supervisory personnel."

To use CRF funds for other administrative personnel's payroll costs, the administrative personnel would have to be reassigned to a "substantially different use." For further guidance on "substantially different use," see the NCPRO FAQ #2.1c.

In addition, if you have to hire new staff, who were not included in the most recent enacted budget as of March 27, 2020, to manage COVID-19 administrative work, CRF funds may be used to cover payroll costs for these new positions.

2.2d Temporary COVID-19 specific grant manager

Yes. Treasury guidance allows for "expenses for technical assistance to local authorities or other entities on mitigation of COVID-19-related threats to public health and safety."

2.2e Audit expenses

Yes, such expenses would be eligible expenditures, subject to the limitations set forth in [2 C.F.R. § 200.425](#).

2.2f Payroll expenses

CRF money can be used for payroll expenses directly related to mitigating COVID-19.

- For substantially dedicated employees (those who spend 50% or more of their time on COVID-19 mitigation), you can use CRF to cover 100% of their payroll expenses.



- For employees who spend less than 50% of their time directly responding to COVID-19, you may pro-rate their payroll expenses for the time dedicated to mitigating COVID-19.

What does “substantially dedicated” mean?

The U.S. Treasury guidance allows, “as a matter of administrative convenience,” all public safety and public health employees to be presumed to meet the threshold for substantially dedicated without needing supporting documentation on time spent on COVID-19 specific work. On September 2, the Treasury expanded the list of positions presumed to be substantially dedicated:

- Public safety: “police officers (including state police officers), sheriffs and deputy sheriffs, firefighters, emergency medical responders, correctional and detention officers, and those who directly support such employees such as dispatchers and supervisory personnel”
- Public health: “employees involved in providing medical and other health services to patients and supervisory personnel, including medical staff assigned to schools, prisons, and other support services essential for patient care (e.g. laboratory technicians) as well as employees of public health departments directly engaged in matters related to public health and related supervisory personnel”

What about 911 call center employees?

Yes, Treasury guidance now includes dispatchers and supervisory personnel who support public safety employees.

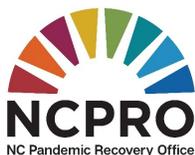
I don't understand the "non-supplant" prohibition; salaries are already budgeted in annual budget and can be funded through CRF, but other line items in budget cannot be?

Supplanting is: If the government’s most recently approved budget prior to March 27, 2020 had a provision to allocate \$10,000 for personal protective equipment (PPE) to address COVID-19. The County must use county funds to purchase \$10,000 of PPE and any amounts spent over \$10,000 for PPE can be covered by CRF monies. A cost meets this requirement if either:

1. The cost cannot lawfully be funded using a line item, allotment, or allocation within that budget, or
2. The cost is for a substantially different use from an expected use of funds in such a line item, allotment, or allocation.

Employees on leave

For substantially dedicated employees, eligible payroll benefits include all types of leave (vacation, family-related, sick, military, bereavement, sabbatical, jury duty). Further, government employers are required to provide Family First Coronavirus Response Act (FFCRA) leave to all employees. FFCRA leave is an eligible CRF expenditure.



For more information on FFCRA leave, visit:

<https://www.dol.gov/agencies/whd/pandemic/ffcra-employee-paid-leave>

Hazard pay

On September 2, the Treasury provided additional guidance that “hazard pay specifically may only be covered to the extent it is related to COVID-19.”

Across-the-board hazard pay, even for substantially dedicated employees, is not eligible. You can provide hazard pay for the hours “performing hazardous duty or work involving physical hardship that in each case is related to COVID-19,” regardless of whether the employee is substantially dedicated.

2.2g Equipment time

There are no schedules for equipment time. This differs from FEMA, where equipment time can be reimbursed for COVID-19 related travel.

2.2h Ambulances and similar vehicles

US Treasury Guidance states that medical response expenses, including emergency medical transportation, that are related to COVID-19 are nonexclusive examples of eligible expenditures. Please note that it is essential to provide substantial documentation that the purchase was made to mitigate COVID-19-related emergencies. Ambulances purchased for regular medical-related emergencies are not allowable expenditures.

On October 19, the US Treasury directly addressed equipment purchases, such as vehicles (see [UST FAQ #58](#)). To be eligible, the government must:

1. Determine that it is not able to meet the need arising from the public health emergency in a cost-effective manner by leasing property or equipment or by improving property already owned, and
2. Maintain documentation to support this determination.

2.2i Cleaning government buildings and facilities

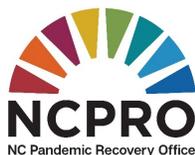
Expenses for disinfection of public areas, buildings, parks, and other facilities, e.g., nursing homes, in response to the COVID-19 public health emergency, are allowable expenses.

2.2j Park reservation refunds

Refunds provided to customers would be consider an unallowable expense since it would be revenue replacement.

2.2k Business loan programs

Yes. However, all loan repayments as of or after December 30, 2020, and interest, must be returned to the NCPRO for return to the US Treasury. Loan repayments cannot be placed into an unrestricted fund for future use by the local government.



2.2l Business grant programs

Business grants are allowable. A program should assist businesses with the costs of business interruption caused by required closures and should be tailored to assist those businesses.

2.2m Government-administered grant programs

Governments can set up and administer grant programs as long as the grants are directly related to mediating or responding to COVID-19. The government entity must provide oversight and monitoring of their subrecipients and are subject to the sanctions of [S.L. 2020-4](#) if their sub-subrecipients misuse CRF funds.

2.2n Local Education Agency (LEA) expenses

Funds may be used for certain educational expenses. Local governments should work with their school districts to determine unmet needs. On September 2, the Treasury specified that they will “presume that expenses of up to \$500 per elementary and secondary school student to be eligible expenditures, such that schools do not need to document the specific use of funds up to that amount.” The Treasury provided additional guidance on October 19: if an entity claims the \$500 per student presumption, they may only claim the following additional COVID-related expenses if relevant:

- Expanding broadband capacity
- Hiring new teachers
- Developing an online curriculum
- Acquiring computers and similar digital devices
- Acquiring and installing additional ventilation or other air filtering equipment
- Incurring additional transportation costs; or
- Incurring additional costs of providing meals.

See [US Treasury Guidance](#) and [FAQ #53](#) for more details.

2.2o Telework equipment

Yes, equipment that allows for teleworking to mitigate spread of COVID-19 is allowable

2.2p Hurricane and future public health disasters

CRF funds cannot be used to prepare for future disasters.

2.2q Utilities

You cannot directly replace lost revenue for utility payments. However, you can create a grant program for individuals who have been affected by COVID-19 to assist in paying their utility bills. If a customer's electricity was previously disconnected for nonpayment, and due to EO 124, the county reconnected the customer electricity, the cost associated with reconnection is allowable. If employees are substantially redirected to other duties such as developing repayment plans for customers who have not made payments under EO 124, these expenses are allowable. Examples of utility



assistance grant programs can be provided by emailing NCPRO at NCPRO@osbm.nc.gov.

2.2r Emergency financial assistance (including rent, mortgage)

Program assistance to individuals with payment of overdue rent or mortgage payments to avoid eviction or foreclosure or unforeseen financial costs are allowable per US Treasury guidance. The assistance must be a necessary expenditure due to COVID-19. You can decide to administer this assistance as a grant program or work with a third party. For example grant programs, please reach out to NCPRO at NCPRO@osbm.nc.gov.

2.2s Childcare assistance

Assistance to childcare providers in the form of small business grants is an allowable use of funds, as is assistance to individuals to allow them to continue to access childcare for their child. In both cases, applicants for these funds must document the necessity of these grants due to COVID-19. For example, a daycare provider could demonstrate business interruption due to mandatory closures, or declining enrollment as parents withdraw their children from daycare. Individuals may show a job loss or reduction in hours because of COVID-19 that makes it difficult for them to continue to send their child to daycare. For example grant programs, please reach out to NCPRO at NCPRO@osbm.nc.gov.

2.2t Critical public health infrastructure upgrades

Yes, the Treasury allows for the upgrade of critical public health infrastructure, such as providing access to running water in rural and tribal areas. Note that these funds must be spent - not encumbered or contracted - by December 30, 2020.

2.2u Are public university student refunds for tuition, room and board, meal plans and activity fees eligible CRF expenditures?

Yes, these expenditures are eligible if

1. They are necessary and incurred due to the public health emergency
2. They have not and will not be reimbursed by another federal program (including the Higher Education Emergency Relief Fund).

2.2v What happens if a vendor cannot deliver a good or service before December 30, 2020?

Recipients may retain CRF funds necessary to make payments for any outstanding invoices for services and/or goods that were (1) contracted to be completed or delivered within the covered period and (2) are delayed due to circumstances beyond the Recipient's control that relate to COVID-19 (i.e., supply chain disruptions, increased demand for services/goods, etc.). The recipient needs to document on the final reports that this is an Accounts Payable due to allowable delayed delivery. They need to also document that the proper documentation has been sent from the vendor to NCPRO documenting this disruption (see below).

For the documentation from the Vendor:



- An email from an officer of the company, such as a CEO or CFO, stating that the delivery of goods or services are (or will be) delayed with an explanation as to why they are delayed.
- The vendor needs to confirm in the email that they understand that they will be subject to audit if delivery of goods or services are delayed beyond December 30, 2020. The vendor should be prepared for a potential audit. The auditors may be looking into the past and current delivery schedules.

The underlying assumption is that during normal circumstances the vendor would have been able to deliver the goods or services by Dec. 30, 2020, but due to COVID-19, the vendor is no longer able to maintain their normal schedule because of circumstances outside of the recipient's control.

2.2w What if a vendor cannot guarantee a delivery date prior to December 30?

If the vendor would be able to deliver the goods or services prior to December 30 during normal circumstances and can demonstrate that fact in an audit, the expense may be allowable for CRF. Similar to the guidance in 2.2v, the vendor must provide documentation providing explanation for why the delivery may be delayed and confirming they understand the vendor is subject to audit.

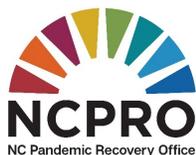
For example, if an entity using CRF places an order for goods on November 30 for goods that would ordinarily take 6 weeks for delivery, that would not be an allowable expense. However, if an order for goods placed on November 30 would ordinarily take 2 weeks for delivery but, due to COVID-19 would take 6 weeks for delivery, the expense would be allowable provided the vendor provide necessary documentation.

2.3 FEMA

Government entities also have access to other sources of relief dollars, including FEMA-PA. COVID-19 was declared a nationwide emergency on March 13, 2020. Subsequent major disaster declarations authorized FEMA to provide Public Assistance (PA) Program funding under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) to state, local, tribal, and territorial government entities and certain private nonprofit organizations for emergency protective measures.

2.3a Can CRF funds be used to match other federal funds?

Yes. As previous guidance has stated, payments from the Fund may be used to meet the non-federal matching requirements for Stafford Act assistance to the extent such matching requirements entail COVID-19-related costs that otherwise satisfy the Fund's eligibility criteria and the Stafford Act. States are fully permitted to use payments from the Fund to satisfy 100% of their cost share for lost wages assistance recently made available under the Stafford Act. (Added to US Treasury FAQs on August 10, 2020)



2.3b We know that CRF funds cannot be used to pay for expenses incurred prior to March 1, 2020. Can we seek FEMA reimbursement for expenses incurred prior to March 1st?

Yes. The COVID-19 incident period for purposes of FEMA Public Assistance reimbursement began on 1/20/2020 and is still ongoing. Governments may apply to FEMA for reimbursement for eligible COVID-19 emergency protective measures expenses incurred on or after 1/20/2020.

2.3c Are we required to apply for FEMA reimbursement before paying for an eligible expense with CRF funds?

No, NCPRO is not imposing a requirement that governments seek FEMA PA reimbursement before using CRF.

2.3d Will receiving CRF funds impact or limit the amount of FEMA Category B reimbursement that government entities (and other potential sub-recipient) are eligible for?

Unlike CRF funding, which was appropriated in specific total dollar amounts, the total dollar amounts of FEMA Category B reimbursement that an applicant may receive is not capped at an overall dollar amount. If an entity exhausts its CRF funds and still has COVID-19 expenses that are eligible for FEMA Category B reimbursement, it may still apply to FEMA for reimbursement of those funds.

It is important to avoid duplication of benefits. Expenses paid for with CRF funds cannot also be reimbursed by FEMA, and vice versa. Entities (and other potential sub-recipient) should carefully track both their COVID-19 expenses along with all sources of federal funds used to pay for those expenses to avoid duplication of benefits and to be prepared to document no duplication of benefits if requested by NCPRO or any federal funder.



3 Compliance

3.1 Are these dollars considered State funds or federal funds, and are there any special accounting requirements?

These are federal funds and should be accounted for in the same manner as other federal funds.

3.2 Are CRF payments considered federal financial assistance for purposes of the Single Audit Act?

Yes, Fund payments are considered to be federal financial assistance subject to the Single Audit Act (31 U.S.C. §§ 7501-7507) and the related provisions of the Uniform Guidance, [2 C.F.R. § 200.303](#) regarding internal controls, §§ [200.330](#), [200.331](#), and [200.332](#) regarding subrecipient monitoring and management, and [subpart F](#) regarding audit requirements.

3.3 Are Fund payments subject to other requirements of the Uniform Guidance?

Fund payments are subject to the following requirements in the Uniform Guidance ([2 C.F.R. Part 200](#)): 2 C.F.R. § [200.303](#) regarding internal controls, 2 C.F.R. §§ [200.330](#), [200.331](#), and [200.332](#) regarding subrecipient monitoring and management, and [subpart F](#) regarding audit requirements.

3.4 Is a municipality liable for ineligible expenditures?

Yes, municipalities as sub-recipients are liable for ineligible expenditures.



4 Accounting

4.1 What is the CFDA number for these federal funds?

The CFDA number assigned to the CRF is 21.019.

4.2 Has the NC Treasury issued any guidance on accounting practices?

NC Treasury guidance for accounting practices can be found at:

<https://www.nctreasurer.com/local-government-covid-19-resources>.

Subscribers can get notifications when updates are available.

4.3 What happens to the interest earned on CRF monies?

Interest or other proceeds earned on CRF funds are subject to the same constraints as CRF. All unspent funds and interest earned on these funds as of December 30, 2020 must be returned to the State, and the State in turn will return the funds to the U.S. Treasury.

4.4 How long can an entity retain funds to pay for delayed goods or services?

It is expected that payments will be made by March 15, 2021.

4.5 Are entities allowed to pay for non-delayed goods or services beyond December 30, 2020?

Yes, as long as payments are made in accordance with standard business procedures. For example, the final payroll period of 2020 may be paid in January 2021 in alignment with a recipient's standard procedures. Regular costs (i.e. payroll, rent, etc.) incurred for December must be prorated as to not include expenses on December 31. Any payments made after January 8 must be included on the January report to NCPRO as an encumbrance or Accounts Payable and noted as such with an expected payment date. It is expected that payments will be made by March 15, 2021.



5 NCPRO Reporting Requirements

As prime recipient of CRF dollars, NCPRO is required to report regularly to US Treasury on all uses of funds by all recipients of CRF in North Carolina. NCPRO must also collect data on use of funds to report to the General Assembly. All uses of funds are being audited by state and federal auditors. Our reporting process is intended to ensure correct use of funds so that recipients are not at risk of recoupment or audit findings.

Entities must submit monthly reports to NCPRO. For more information, please also refer to the NCPRO Application and Compliance presentation.

5.1 When must local governments and sub-recipients report expenditures each month?

Reporting date	Expenditure transactions to include
July 20, 2020	March 1, 2020 - June 30, 2020
August 20, 2020	July 2020 expenditures only
September 21, 2020	August 2020 expenditures only
October 20, 2020	September 2020 expenditures only
November 20, 2020	October 2020 expenditures only
December 21, 2020	November 2020 expenditures only
January 8, 2021	December 2020 expenditures only

Do not accumulate each month's report. Our data collection tools will perform the accumulation.

Local governments should make every effort to report eligible expenditures in the appropriate reporting period.

5.2 What documents are required for entities and sub-recipients for the monthly reports to NCPRO?

- Attachment C-1
- Attachment C-2
- Supporting documentation

Please see below for more details. Note that government entities are not required to submit Attachment A-1 and A-2. You may remove reference to these forms.



Attachment C-1: Descriptive summary of how CRF were used, any deliverables, progress against objectives & expected outcomes

**Attachment C-1
Covid-19 Grant Project Status Report**

Before it will be possible to make any disbursement, you are required to provide to the Agency the status towards the specific purpose as stated in the grant contract (Attachment A-1). This report is to be completed by the grant recipient and each subrecipient. The grant recipient is to ensure all subrecipients' reports are to be included with cost reimbursement requests. RECIPIENT COMPLETION INFORMATION: Email completed form to: <https://ncosbm.sharefile.com/r-rc7f2ca49d574af2a>

1. Organization

Organization Name	
Contract Agreement Number	
Date	

2. Financial Summary

Total Funding Authorized	Total Funding Received to Date	Balance

3. Performance: Recipient (or subrecipient) shall detail below how the organization has spent the amount of funding allocated for the specific purpose as stated in the grant contract. The description should include activities and progress against the recipient's (or subrecipient's) scope of work and outcomes of that work. Attach additional [documents](#) as necessary.

Descriptive summary of how the funds were used, including specific deliverables achieved, and progress against objectives and outcomes expected to be achieved.

Note that Attachment C-1 documents *actual accomplishments and expenditures* to allow NCPRO to verify that your expenditures comply with Federal and State requirements. Examples of performance metrics can be found below.

Examples of performance metrics

Area	Goal	Metric
Retention of employees for COVID-19-related efforts	Prevent employee furloughs and reduce North Carolina's unemployment rate	Number of employees' salaries covered by CRF because employees were repurposed to COVID-19-related efforts
Timely access to food	Ensure North Carolinians adversely impacted by COVID-19 have access to food in a timely manner	Number of clients receiving food since the deployment of CRF funds compared to months without CRF funds
Improve the quality of infection control measures	Provide timely first line of support and protection related to infection control to front-line workers	Number of front-line workers receiving new PPE versus reused or substitute PPE since deploying CRF funds



Attachment C-2: Monthly report of expenditures for recipients and sub-recipients by cost category

**ATTACHMENT C-2: NCPRO Coronavirus grant
Monthly Reimbursement Request**

Attachment C-2 must accompany this form to receive reimbursement from NCPRO.
RECIPIENT COMPLETION INFORMATION: Email completed form to: ncpro@osbm.nc.gov

PART A: Summary of Funding Received and Spent

NAME OF RECIPIENT ORGANIZATION	Contract Agreement Number	Total Funding Authorized by NRS ID#3	Advance	July Reimbursement Request (Details in Part B)	August Reimbursement Request (Details in Part B)	September Reimbursement Request (Details in Part B)	October Reimbursement Request (Details in Part B)	November Reimbursement Request (Details in Part B)	December Reimbursement Request (Details in Part B)	January Reimbursement Request for December Expenses (Details in Part B)	Total Received to Date	Point of Contact Name	Point of Contact Title	Point of Contact Email	Point of Contact Phone Number
											\$ -				

PLEASE REMEMBER INDIRECT COST ALLOCATION AND PERCENTAGE OF ADMINISTRATION COST ARE UNALLOWABLE

PART B: Detailed Expense (In lieu of completing Part B manually, detailed information can be exported from your systems in Excel or .CSV format, however, at minimum, the requested fields must be provided)

Recipient Name or Sub-recipient Name	Date of Invoice, BILLED, or SERVICE	Employee Name or Vendor Name or Contractor	Employee ID Number or Invoice Number	Employee Title or Description of Item Purchased	Required Monthly hours worked or Total Invoice Amount	Actual Employee Hours Dedicated to COVID or Invoice Quantity or # of Patients Served	Employee Expenses (Payroll and benefits cost for employee that are dedicated to COVID-19)	Contracted Labor Expenses	Other Service Expenses (e.g. utilities, telephone, data, lease related expense)	Subcontract Expenses (e.g. construction, maintenance)	Goods Expenses (e.g. supplies, PPE)	Equipment Expenses	Other Expenses (e.g. related charges not assigned in columns H-M and described by recipient, such as, patient services)	TOTAL Expenditures	Is the Vendor a Historically Underutilized Business (HUB)? (YES or NO)
														\$ -	
														\$ -	
														\$ -	
														\$ -	
														\$ -	
														\$ -	

Note: You may correct the formula in Attachment C-2 Section A as follows:

Replace formula (=SUM(D8:K8)

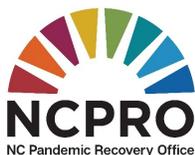
to (=SUM(E8:K8)

The C-2 form breaks out expenditures into 7 cost categories:

- Employee Expenses**, such as hazard pay for COVID ICU nurses or Payroll and benefits cost for employees that are dedicated to COVID-19
- Contracted Labor Expenses**, such as, paying the costs for contractors to transport patients with confirmed or suspected COVID-19 safely to or from facilities.
- Other Service Expenses**, such as, paying the costs to rapidly ramp up infection control and triage training for health care professionals.
- Subcontract Expenses**, such as, paying construction costs to retrofit separate areas to screen and treat patients with suspected COVID-19 infections, including isolation areas in or around hospital emergency departments.
- Goods Expenses**, such as, Personal Protective Equipment (PPE) or supplies purchased in accordance with the Centers for Disease Control and Prevention guidelines.
- Equipment Expenses**, such as, increasing the number of patient care beds to provide surge capacity.
- Other Expenses**, such as, planning, training, and implementing expanded telehealth capabilities.

In addition to the 7 costs categories, this form request detailed information about each expenditure as follows:

- The date the expenditure occurred,
- The name of the employee, vendor, or contractor that was paid
- The unique ID used to identify the employee,



4. The description of the services rendered, or goods purchased,
5. The number of monthly hours worked by an employee or the total invoice amount,
6. The actual hours dedicated to COVID-19 efforts by this same employee, or the invoice quantity or amount that is related to the COVID-19 expenditures or # of Patients Served.

This information should be submitted using the supplied form in Microsoft Excel (.XLSX) or comma delimited or tab delimited format (.CSV). If needed, this information can also be submitted as a download from accounting or payroll systems as .XLSX or .CSV files. The NCPRO [local government presentation from June 30, 2020](#) includes information on BD 701 forms, as well.

Supporting documentation

Please provide the associated invoices, payroll registers, contracts, applications, and/or timesheets to support your detailed expenditures provided on your Attachment C-2. Examples of supporting documentation:

- Payroll excluding substantially dedicated employees - Timesheets
 - Payroll for substantially dedicated employees - Payroll register
- Note: If you already submitted exact same information within 68-03-Attachment C-2, you do not need to submit any additional documentation.
- Purchases of Goods, Services, Contract labor - Contracts, Invoices, Receipts

You can upload supporting documents into one PDF for the month (or use your own method if that is too burdensome). Please consider using the following naming convention to easily match the documentation with the corresponding monthly report:

[Agreement number] [month] supporting documentation

For example, "02-01 July Supporting Documentation"
which would include all March through June expenditures.



5.3 When do we submit Attachment F?

No later than January 30, 2021 or within 45 days of final expenditure of CRF, whichever is earlier. This is a final report, submitted as part of the close-out process after all funds have been expended (or unspent funds returned). See below.

Attachment F: Grant outcomes and accomplishments final report

Attachment F	
Covid-19 Grant Outcomes and Accomplishments Final Report	
<p>To finalize this award, you are required to provide to the Agency with a narrative of the outcomes and accomplishments related to the funds spent for the specific purpose as stated in the grant contract. You can use the secure link provided below to upload images, brochures, and other information to illustrate your outcomes and accomplishments. https://ncosbm.sharefile.com/r-rc7f2ca49d574af2a</p>	
1. Organization:	
Organization Name:	
2. <u>Outcomes and Accomplishments:</u>	

Attachment F is a narrative of everything you accomplished with the CRF funds. Please be as descriptive as possible. Pictures are encouraged.

5.4 NCPRO Document Submission

Entities should submit the monthly reports to NCPRO using their entity-specific upload links. Municipalities and sub-recipients who need to submit monthly reports should send them to the county to be uploaded. Please review the following information to ensure documents submitted through entity-specific links are uploaded successfully.

5.4a Important! Naming conventions

All files submitted to NCPRO must start with the agreement number of the county. Entities should assign sub-recipients extensions of their agreement number. See example of naming convention for entity 02-01's sub-recipient for Attachment C-2:

02-01-01 Entity A Attachment C-2-July
02-01-02 Entity B Attachment C-2-July
02-01-03 Entity C Attachment C-2-July

Additional naming convention notes

- ✗ Do not use special characters in file names (including underscores “_”)
- ✗ Do not use spaces before or after the hyphen in the agreement number
- ✗ Do not delete unused columns in the report. NCPRO uses a data analytic tool, which requires that all spreadsheets have the same formatting.

5.4b Correcting errors

- ✓ If you need to correct a submission, make your corrections, and submit using the same exact name, the system will overwrite your previous submission.
- ✓ If you submitted the first submission incorrectly due to the file naming convention used, resubmit using the approved file naming convention.
- ✗ Do not add additional wording, such as, version 1, version 2, to the file name. We only need one copy of your report within our records.

5.5 How do I report expenditures between March 1 and June 30?

Please submit any expenditures between March 1 and June 30 in a July monthly report. We understand that many municipalities will be submitting their expenditures for the first time in September. Please use the chart in question 5.1 to separate expenditures into the corresponding monthly report.

5.6 How do we handle final reporting if we have outstanding invoices?

For eligible expenditures to be considered, entities should have all final documented expenditures, including their sub-recipient expenditures, prepared for the NCPRO office no later than March 15, 2021. Any submissions after this date may be declined for review.

5.7 What documentation must a local government retain for audit purposes?

The local government shall retain documentation to allow an auditor to conclude the purchase is needed, proper purchasing methods were followed and there is evidence the service or goods were received. A local government is responsible for compliance with the provision in [2 C.F.R. Part 200 Subpart F](#) for audit documentation.



5.8 Additional requirements for vendors and sub-recipients paid \$50,000 or more

In accordance with US Treasury requirements, CRF sub-recipients and vendors are to register with SAM.gov (<https://sam.gov/SAM/>). NCPRO has asked local governments to communicate this to all vendors and sub-recipients who received \$50,000 or more. For more information on this process, please review the [Treasury OIG FAQs Related to Reporting and Recordkeeping](#).

In addition, if you have not already, please provide our office with the following information for each of these vendors and/or subrecipients as soon as possible:

- Legal Name of Vendor or Subrecipient
- Address (including 9-digit zip code)
- DUNS Number
- Phone Number
- Email

