Coronavirus Relief Fund
Frequently Asked Questions
for Local Governments
August 28, 2020

Purpose
The North Carolina Pandemic Recovery Office (NCPRO) provides technical assistance to Coronavirus Relief Fund (CRF) recipients, including local governments. 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 August 28, 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

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.

1 Updated on August 28, 2020 to fix typos in questions 5.6 and 5.7.
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1. Receipt of Funds
The federal Coronavirus Aid, Relief, and Economic Security (CARES) Act included over $4 billion to North Carolina. Some dollars were directly allocated to entities, agencies, and local government with populations over 500,000. Much of the money was directed to the NC General Assembly, which passed Session Law 2020-4 to begin allocating these dollars throughout the state. SL 2020-4, as amended by SL2020-80, allocated $300 million to counties and requires counties to pass at least 25% of their total allocation to their municipalities. NCPro is responsible for administering and auditing these allocations, in addition to external state and federal audits. The county allocations occurred in two rounds.

1.1 How do we 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:

- **Step 1**: Receive Application from NCPro
- **Step 2**: Submit Attachments A-1, A-2, A, E, W-9, and Electronic Payment Request Form to NCPro
- **Step 3**: NCPro processes documents, sends back contract for electronic signature
- **Step 4**: Sign contract electronically. Executed contract is routed back to NCPro
- **Step 5**: NCPro transfers funds within 10 days after receiving executed contract
- **Step 6**: Send proof of use of funds and reimbursement documentation to NCPro monthly
- **Step 7**: Use ALL funds by December 30, 2020 or return unused funds to NCPro
- **Step 8**: Comply with NCPro Audit Requests (before or after 12/30/2020)
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?
No, the legislature is not defining this methodology. The county must use a rational and consistent approach.

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. SL2020-80 state, “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.”

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.

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

1.4a Can plans be modified?
Yes. We understand that we are in the midst of an international pandemic, and that 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 county-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 county-specific upload link? Link were previously emailed to all counties. 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. This is the process NCPRO follows 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 County 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.

Website: https://ncpro.nc.gov
Email: NCPRO@osbm.nc.gov
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 county, without taking into account subsequent supplemental appropriations or other budgetary adjustments, or amendments made in response to COVID-19.

If your county made budget adjustments, amendments or supplemental appropriations prior to or after March 27, 2020, CRF funds can be used for those adjustment, amendments, or supplemental appropriations as long as the expenditures meet these two requirements: (1) Necessary expenditure incurred between March 1 and December 30, 2020 and (2) related to 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.
2.2b Reimbursement
CRF monies can be used to reimburse counties 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
No. There is no allowance for administration costs as an overhead cost.

What about administrative staff?
Administrative staff within public safety and public health departments are not presumed to be "substantially dedicated."

To use CRF funds for payroll cost related to administrative personnel, the administrative personnel would have to be reassigned to a "substantially different use." For further guidance on "substantially different use," see the FAQ: What constitutes a "substantially different use" of funds?

In addition, if you have to hire new staff, which was 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 cost 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 for “public safety, public health, health care, human services, and similar employees whose services are substantially dedicated to mitigating or responding to the COVID-19 public health emergency.” Payroll expenses include salaries and benefits, hazard pay, and overtime costs.

What does “substantially dedicated” mean?
An employee must spend 50% or more of their time on COVID-19 mitigation to be substantially dedicated.

“As a matter of administrative convenience,” all public safety and public health employees may be presumed to be substantially dedicated. This means these employees do not have to document that greater than 50% of their time was spent on COVID-19 mitigation. Instead, you can assume this was the case for these employees. You can use CRF to cover 100% of their payroll expenses.

CRF funds can also be used for payroll expenses of staff hired to meet COVID-19 response needs (such as additional EMS, contact tracers, grant monitors, etc.).
You may want to document the hours spent on COVID-19 mitigation for these employees to confirm these employees are substantially dedicated.

Other employees (those who are not public health, public safety, health care, human services, or similar) must meet the Treasury guidance on “substantially different use” for payroll expenses of these employees to be an eligible CRF expense. This guidance states that “costs of personnel that were budgeted in the most recently approved budget but which, due entirely to the COVID-19 public health emergency, have been diverted to substantially different functions” may be funded with CRF. For example, if a librarian has been reassigned to handing out PPE or installing protective barriers, that is a substantially different use of their time. However, a county accountant who now spends all her time managing COVID-19-specific funds is still performing essentially the same task; the type of funds she is managing does not change this role.

What about 911 call center employees?
Treasury guidance at this time does not speak directly to 911 call center staff. Local governments that are aiming to claim these staff members should be prepared to thoroughly document 911 staff members’ workload as it relates to COVID-19 response and mitigation.

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 county’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 a local government to use CRF money to pay for leave, the leave must comply with the Family First Coronavirus Relief Act (FFCRA) requirements. If the government cannot ensure that the leave was taken for reasons outlined in FFCRA, then CRF money cannot be used for leave (such as leave taken because an employee cannot work from home). Regardless of what your government calls the leave (bonus leave, emergency leave, etc.), the leave is reimbursable if used for FFCRA leave.
OSBM suggests structuring leave under the FFCRA leave types and making sure that employees properly record time. Budget amendments and changes to your government’s budget do not affect the ability to reimburse these expenses.

For more information, visit: https://www.dol.gov/agencies/whd/pandemic/ffcra-employee-paid-leave

Hazard pay
Hazard or incentive pay is an allowable expense. The local government must determine the rate of hazard pay to be provided. That rate should be set forth in a County policy. Hazard or incentive pay can be a one-time bonus, a percentage of base pay, or compensatory leave; it is up to the local government. General bonuses to all employees not for hazard pay are not COVID-19 expenses and, thus, are not allowable CRF expenses. Hazard pay is a form of payroll expense and so Fund payments may only be used to cover hazard pay for individuals that meet the “substantially dedicated” requirement.

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 responses expenses, including emergency medical transportation, related to COVID-19 are nonexclusive examples of eligible expenditures. NOTICE: It is critical to provide ample documentation that the purchase was made to mitigate COVID-19-related emergencies. Ambulances purchased for regular medical-related emergencies are not allowable expenditures.

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 considered 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 County-administered grant programs
Yes, the county can set up and administer a grant program as long as the grants are directly related to remediating or responding to COVID-19. Counties 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
Fund may be used for certain educational expenses. Local governments should work with their school districts to determine unmet needs. See US Treasury Guidance and FAQs 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.
2.3 FEMA
Local governments 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, 2010)

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. Counties 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?
While NCPRO is not imposing a mandatory requirement that local governments seek FEMA PA reimbursement first, NCPRO strongly recommends that local governments do so. This approach enables local governments to maximize use of their CRF funds by applying those funds toward COVID-19 expenses for which there is not another federal funding source. Unlike CRF funds, which are capped at a specific dollar amount, the FEMA Public Assistance Program does not place a total dollar cap on reimbursement under that program. While FEMA must approve the expenses for reimbursement, there is no cap on the total amount of reimbursement an eligible applicant may receive.

2.3d Will receiving CRF funds impact or limit the amount of FEMA Category B reimbursement that counties (and other potential sub-subrecipients) 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 a local government 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. Counties (and other potential sub-subrecipients) 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 can only be used as prescribed in the US Treasury guidance.
5. NCPRO Reporting Requirements

As prime recipient of CRF dollars, NCPRO reports to the US Treasury monthly (starting in September).

Local governments must submit monthly reports to NCPRO. NCPRO’s auditing and compliance team presented on reporting requirements for local governments on June 30, 2020. Please review the video here, starting around minute 14:23.

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

<table>
<thead>
<tr>
<th>Reporting date</th>
<th>Expenditure transactions to include</th>
</tr>
</thead>
<tbody>
<tr>
<td>July 20, 2020</td>
<td>March 1, 2020 - June 30, 2020</td>
</tr>
<tr>
<td>August 20, 2020</td>
<td>July 2020 expenditures only</td>
</tr>
<tr>
<td>September 21, 2020</td>
<td>August 2020 expenditures only</td>
</tr>
<tr>
<td>October 20, 2020</td>
<td>September 2020 expenditures only</td>
</tr>
<tr>
<td>November 20, 2020</td>
<td>October 2020 expenditures only</td>
</tr>
<tr>
<td>December 21, 2020</td>
<td>November 2020 expenditures only</td>
</tr>
<tr>
<td>January 20, 2021</td>
<td>December 2020 expenditures only</td>
</tr>
</tbody>
</table>

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 local governments and sub-recipients for the monthly reports to NCPRO?

Attachments C-1 and C-2. Please see below for more details. Note that local governments 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.sharedfile.com/x-v7Gca49slv70qF2a

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.

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

1. **Employee Expenses**, such as hazard pay for COVID ICU nurses or Payroll and benefits cost for employees that are dedicated to COVID-19
2. **Contracted Labor Expenses**, such as, paying the costs for contractors to transport patients with confirmed or suspected COVID-19 safely to or from facilities.
3. **Other Service Expenses**, such as, paying the costs to rapidly ramp up infection control and triage training for health care professionals.
4. **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.
5. **Goods Expenses**, such as, Personal Protective Equipment (PPE) or supplies purchased in accordance with the Centers for Disease Control and Prevention guidelines.
6. **Equipment Expenses**, such as, increasing the number of patient care beds to provide surge capacity.
7. **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:

1. The date the expenditure occurred,
2. The name of the employee, vendor, or contractor that was paid
3. 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 [local government presentation from June 30, 2020](https://ncpro.nc.gov) includes information on BD 701 forms, as well.

**5.3 When do we submit Attachment F?**
No later than January 31, 2021. 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 for more detail.
5.4 NCPRO Document Submission

Counties should submit the monthly reports to NCPRO using their county-specific upload links. Any 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 county-specific links are uploaded successfully.

5.4a Important! Naming conventions

All files submitted to NCPRO must start with the agreement number of the county. Counties 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
5.4b Correcting errors

- Do not delete unused columns in the report. NCPRO uses a data analytic tool, which requires that all spreadsheets have the same formatting.

- 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 Clarifications on July 20, 2020 Monthly Report

Please report by July 30th if you plan to claim expenditures from March 1, 2020 - June 30, 2020. NCPRO must provide the NC State Controller with information about your March 1, 2020 - June 30, 2020 expenditures. We also need the amount of unspent funds on June 30. This will allow the NC Office of Controller to record the unearned revenue liability for the North Carolina financial statements.

If you have no expenditures to claim for March -June 2020, submit Attachment C-1 only to state this fact.

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

For eligible expenditures to be considered, Counties 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.