

Governor's Office for Emergency Relief & Recovery

CORONAVIRUS RELIEF FUND PAYMENTS TO LOCAL GOVERNMENTS

Program Overview and Guidance

UPDATED July 21, 2020



The Governor has authorized the allocation and expenditure of \$40 million total, \$32 million to municipalities and \$8 million to counties, to cover eligible COVID-19-related expenses incurred from March 1, 2020 to October 15, 2020. Eligible reimbursements through other federal sources, including FEMA and any state or local match must be excluded. These amounts have been allocated and made available to all municipalities and counties based on 2018 population figures from the Office of Strategic Initiatives. The allocated amounts can be found on the website of the Governor's Office for Emergency Relief and Recovery (GOFERR) (www.goferr.nh.gov).

Local governments will only be reimbursed for COVID-19-related expenses actually incurred, but only up to the amounts allocated based on population figures. No local government can receive total reimbursements from the GOFERR Coronavirus Relief Fund exceeding its allocated amount. For example, if \$100,000 was allocated to Municipality A, Municipality A could not be reimbursed for eligible expenses totaling more than \$100,000, even if Municipality A's eligible expenses from March 1, 2020 to August 31, 2020 amount to \$200,000. Any amount allocated that exceeds the eligible expenses submitted for reimbursement by a local government from March 1, 2020 to October 15, 2020, will, after the final request is processed, lapse back to the GOFERR Coronavirus Relief Fund to be available to the State for other disbursement.

In October, local governments will be required to estimate the additional COVID-19-related expenses they will incur through December 30, 2020.

Grant Agreement: Each local government must submit by e-mail, a signed grant agreement to GOFERR to be eligible for the funds. To request or verify your vendor number (Item 1.6 of the Grant Agreement), please visit: <https://das.nh.gov/purchasing/vendorresources.aspx> and for questions, email: prch.web@das.nh.gov.

For questions and to submit a completed agreement, please email municipalities@goferr.nh.gov, if a municipality, or counties@goferr.nh.gov, if a county. The agreement is available on the GOFERR website (www.goferr.nh.gov)

Reimbursement Requests: Local governments must submit reimbursement requests to GOFERR by email (using the Reimbursement Request Form), including expense details/explanations, estimates, if applicable, and supporting documentation. Please email municipalities@goferr.nh.gov, if a municipality, or counties@goferr.nh.gov, if a county. The form is available on the GOFERR website (www.goferr.nh.gov).

Reimbursement submission dates are June 1, 2020, July 15, 2020, -September 15, 2020 and October 30, 2020. Requests received outside of these windows will not be processed and only one (1) reimbursement request will be processed for each of the four reimbursement dates. GOFERR will make every effort to issue all checks within 30 days after receipt of the request.

The restriction on submission of costs incurred to specific reimbursement periods initially contained in the grant agreement is waived except as follows. Grantees may submit a payment request on the form provided by GOFERR by e-mail for allowable costs :

For allowable costs incurred from March 1, 2020 to April 30, 2020, during any of the three reimbursement period dates of June 1, July 15 or September 15.

For allowable costs incurred from May 1 to June 30, 2020, during any of the two reimbursement period dates of July 15 or September 15.

For allowable costs incurred from July 1 to August 31, during the reimbursement period date of September 15, 2020.

For allowable costs incurred from September 1 to October 15, during the reimbursement period date of October 30, 2020.

NOTE: Expenses incurred prior to September 1 cannot be submitted in the added reimbursement period request in October. They will be disallowed. The sole exception is for expenses submitted for FEMA reimbursement for which a denial by FEMA is received prior to October ~~30~~15.

Guidance on Allowable Costs: To the extent not covered by another relief funding source:

1. For the purposes of facilitating payment requests, GOFERR will presume the following four (4) categories of expenses to be 75% FEMA reimbursable and GOFERR will reimburse the remaining 25%:
 - Personal Protective Equipment related to COVID-19;
 - Police/Fire/Emergency Medical Overtime Costs;
 - Temporary Medical Facilities and/or Enhanced Medical/Hospital Capacity, and
 - Disinfection of Public Facilities.
2. Necessary expenditures due to the COVID-19 public health emergency means:
 - Costs related to local government actions taken to respond to the public health emergency;
 - Expenditures that respond to second order effects of the public health emergency;
 - economic support for employment related losses for citizens and businesses.
 - economic support for losses due to business interruptions for citizens and businesses.
3. Treasury will use a standard of “reasonable judgment of the government officials responsible” in reviewing whether an expenditure is necessary.
4. Costs not accounted for in the budget most recently approved as of March 27, 2020. Unbudgeted means:
 - Cannot lawfully be funded using a line item, allotment, or allocation within that budget.
 - Is for a substantially different use from any expected use of funds in such a line item, allotment, or allocation.
5. A cost is only “incurred” when the responsible unit of government has expended funds to cover the cost during the period March 1, 2020 to October 15, 2020. GOFERR will use the most recent Treasury Guidance principles in determining if a cost has been incurred prior to October 15, 2020.

Examples - Not Allowable:

- Costs accounted for in the budget most recently approved as of March 27, 2020;
- Compensating for revenue shortfalls;
- The ~~75~~25% of FEMA-eligible expenses; (revised May 28, 2020)
- Expenses covered by other federal programs such as community development block grants;
- Workforce bonuses other than hazard pay or overtime;
- Across the board hazard pay to all employees that are working during the state of emergency;
- A public function does not become a “substantially different use” merely because it is provided from a different location or through a different manner;
- Capital improvement projects are not necessary expenditures incurred due to the COVID-19 public health emergency;

- Prepayments on contracts to the extent that doing so would not be consistent with ordinary course policies and procedures;
- Assistance to property owners to pay property taxes;
- Severance pay or legal settlements.

Examples - Allowable

- Increased welfare costs for food, shelter, and utilities;
- Interest on Tax Anticipation Notes (TANs) or other short-term borrowing due to higher than usual property tax delinquencies;
- New telework costs for remote municipal operations such as computers, software, and networking costs;
- Increased election costs (if not covered by other federal funding);
- Wages and benefits required by the Families First Coronavirus Response Act for non-First Responders;
- Childcare costs for First Responders and essential employees due to school closures;
- Increased unemployment costs for municipalities that self-fund and are not otherwise covered.
- Legal fees associated with new federal requirements and State of Emergency orders;
- Municipal building modifications including more frequent cleaning/disinfecting and installations necessary for social distancing and public safety;
- Facility signage such as park/beach closures;
- Credit card fees where the municipality waives the fees paid by cardholders since “in-person” payments are not an option.
- 25% match on FEMA eligible costs. (revised May 28, 2020)
- Administrative leave costs to a greater extent than was expected allocated to an employee who could not telework, due to closure or COVID-19 in the workplace.
- “As a matter of administrative convenience,” the entire payroll costs of certain employees (public safety, public health, health care, and human services) whose time is substantially dedicated to mitigating or responding to the COVID-19 health emergency is eligible, provided costs are incurred for purposes of this grant by October 15, 2020.
- **All eligible expenses must be related to COVID-19**

Record Retention Requirements:

Per the Office of Inspector General (OIG) Memorandum OIG-CA-20*021: Records shall be maintained for a period of five (5) years after final payment is made using Coronavirus Relief Fund monies. These record retention requirements are applicable to all prime recipients and their grantees and subgrant recipients, contractors and other levels of government that received transfers of Coronavirus Relief Fund payments from prime recipients.

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

Links to Treasury Guidance:

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

The New Hampshire Municipal Association also has FAQ’s regarding this program on its website and is available to provide guidance to municipalities.