Eligible Costs

Question 1: If a local Volunteer Fire Department spent money, that they did not budget for, on PPE and sanitization equipment due to the Coronavirus, would the county be cleared to reimburse them with money it receives if the Volunteer Fire Department is a non-profit agency but the county does support them with some funding?

Question 2: Payroll Expenses – Is Overtime for Law Enforcement and Public Health/Healthcare eligible under this funding?

Question 3: What is included as a grant for reimbursement for costs of business interruption? Is that to pay their employees, pay their rent or utilities, purchase operational supplies, etc.?

Question 4: Can a City purchase protective equipment for small businesses that can be reimbursed?

Question 5: Regarding payroll expenses and for public safety, food delivery, etc., Exhibit B, 8b states “Were not accounted for in the budget…”. If an applicant has public safety personnel and home food delivery for senior citizens which was switched to substantially dedicated to mitigating COVID-19, but mostly within existing budget, would these expenses not qualify for the $55 per capita allocation?

Question 6: Can hazard pay be back paid to employees starting March 1, 2020 to current date if it is not included in this year’s budget?

Question 7: Would a drop in budgeted revenue qualify?

Question 8: The CARES Act Relief Fund Grant Program mentions payroll related to the COVID-19 emergency as an eligible expense. Does that mean straight time and overtime?

Question 9: Can an applicant use Coronavirus Relief Fund for the additional cleaning and cleaning products to fight the virus at all of its facilities?

Question 10: Can the funds be used for the purchase of hand sanitizer for all of an applicant’s facilities?

Question 11: Can the funds be used to pay for government employees to barricade playgrounds?

Question 12: Can an applicant utilize these funds for contracting with a person to provide childcare, so employees do not miss work when their children lost childcare?

Question 13: Are the funds available for antibody testing of all employees?

Question 14: Can a city, who receives money under CRF, give some or all of that money to a special water district within their city?

Question 15: Is there a list out there that shows specific COVID-19 related costs that are eligible for reimbursement?

Question 16: Is the TDEM reimbursement for nursing home testing going to come out of the counties’ allotment of funds or is this going to come from somewhere else?
Question 17: Would this include general employees who are not public safety or healthcare that are responsible for managing reimbursement of COVID-19 funds, managing budgets related to COVID-19 expenditures, purchasing COVID-19 protective equipment, staff who have been cross-trained to operate COVID-19 hotlines or information channels, or public information officers dedicated to keeping the community updated with services offered to help treat, mitigate or respond to COVID-19 public health measures?

Question 18: If an applicant is over budget on part-time EMS workers who staff an ambulance, could these funds be used to cover the extra cost above the budgeted amount?

Question 19: Can the funds be used to pay employee cost of Emergency Management Coordinator for time spent on COVID-19 activities?

Question 20: Can the funds be used to pay employee cost of a City Manager for time spent on COVID-19 activities?

Question 21: In an instance where COVID-19 created a need for an EMC to have a dedicated vehicle for the purpose of emergency management; if the vehicle is to be used to conduct COVID surveillance, respond to medical calls, transport equipment, check on and enforce the Governor’s executive orders, and any other COVID related issues that continue to arise, would the purchase be an eligible cost?

Question 22: Is administrative leave is an allowable expense under CRF? It appears that it would be given:

5. Expenses associated with the provision of economic support in connection with the COVID-19 public health emergency, and
6. Any other COVID-19-related expenses reasonably necessary to the function of government that satisfy the Fund’s eligibility criteria.

Question 23: What are some examples of types of covered employees?

Question 24: Is the category of covered employees strictly to be used for any employee categorized by definition as public safety, public health, or healthcare?

Question 25: Can the City give cash grants for small businesses that can be reimbursed?

Question 26: For a rural county that doesn’t have a hospital, can the funds be used to build a Public Health building that can be used to mitigate the spread of the COVID-19 virus? This building would have exam rooms and bays for drive through testing. The building would be used by our local health official and other medical staff. Can the funds be used for construction of this building as well as the outfitting of medical supplies? If they can, are there certain things outlined that the funds can’t be used for, pertaining to the construction and outfitting?

Question 27: In an historical building can an applicant install doors and barriers that protect office staff and satisfies the Historical Commission? If these qualify, can they be done in a manner that matches the existing counters and are of lasting quality?

Question 28: The Guidance says that funding can be used to meet 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. How does a government determine whether payroll expenses for a given employee satisfy the “substantially dedicated” condition?
Question 29: The Guidance says that a cost was not accounted for in the most recently approved budget if the cost is for a substantially different use from any expected use of funds in such a line item, allotment, or allocation. What would qualify as a “substantially different use” for purposes of the Fund eligibility?

Question 30: Can the City pay for all fire and police personnel cost between March and December or only for time spent on COVID-19 activities for these departments?

Question 31: Is the purchase of a new medic/ambulance unit eligible under these guidelines if it is to replace an existing ambulance with significant mechanical issues?

Question 32: When a county houses inmates on a state hold while the state is not picking up inmates due to Covid-19, the county is not legally allowed to release the inmates. In this situation, are unbudgeted expenses including medical care covered under CRF even if the inmates are housed past the time the county is statutorily required to house them?

Question 33: In reference to the previous question - if so, will the county be able to recover any of the staff time for the jailers?

Question 34: If the county sets up an economic relief fund to assist small business who were forced to shut down and are now trying to get back on their feet, would these costs be reimbursable through CRF?

Question 35: Can the CRF funds be used for aiding in telecommuting of staff and purchase of tablets/laptops for the conducting of the council meetings?

Question 36: Can CRF funds be used to procure a computer automated dispatch software that would have the capabilities to prompt our dispatch center and responding units as to whether or not a location is affiliated with a positive COVID-19 case and also allow them to relay pertinent information relating to whether or not the person meets the criteria for COVID-19?

Question 37: Are the costs to have barriers built in our offices so the public and employees can function safely due to COVID 19 an eligible expense?

Question 38: Would the unbudgeted cost of hiring a part time or temporary bathroom monitor to clean/sanitize public restrooms in a courthouse and annex be an eligible cost?

Question 39: Are costs related to technology necessary to Software/hardware to run Zoom meetings due to COVID-19 covered?

Question 40: Are costs for tablets for council members to be able to work from home an eligible expense?

Question 41: Are updates to a website to allow for web payments for utilities an eligible cost?

Question 42: Is funding an isolation project for the County jail to increase the current isolation capacity of the current facility an eligible expense? This is basically a renovation project.

Question 43: Is funding a project to add a supplemental permanent exterior addition module to our current jail an eligible expense? This is basically a modular unit attached to our current facility.

Question 44: If an applicant reassigns someone away from their current non-Emergency Management (EM) staff position, to a part time EM position that is COVID focused, is that salary reimbursable?
**Question 45:** Is it correct to say that reimbursement for an employee, such as a PIO, who has been working COVID since the declaration, if that is their full time job during “normal” operations, e.g. A County PIO in their normal job position, who now has an increased workload because of COVID, their salary is not reimbursable, but any overtime would be?

**Question 46:** Can both city and county CRF funding be used for their nursing homes to support healthcare and medical expenses to address COVID initiatives that have not been covered by other COVID funding streams?

**Question 47:** Is an economic small business grant program an eligible cost? If the grants were provided through a donation through our economic development group is the cost eligible?

**Question 48:** Would building a structure to house the PPE be an eligible cost?

**Question 49:** With regards to qualifying medical expenses – can CRF money be used to pay for eligible expenses at a private (not public) hospital?

**Question 50:** Do payroll expenses INCLUDE fringe?

**Question 51:** The guidance documentation states “3. Payroll expenses for public safety, public health, …and similar employees …” – please verify this is straight time reimbursement.

**Question 52:** Are grants to home owners who are unable to pay pre-defined, legitimate expenses such as their mortgage an eligible expense?

**Question 53:** Are there any set guidelines to follow for grants to businesses; for instance number of employees, revenue annually, or lost revenue?

**Question 54:** Where can an applicant find guidance in relation to “economic support in connection with the COVID-19 emergency”?

**Question 55:** What would qualify as substantially dedicated to mitigating and responding to COVID19 emergency, for instance 50% or more of staff time?

**Question 56:** What would qualify as substantially different use from expected use of funds?

**Question 57:** Would Fire, Police, Emergency Management, Public Health, City Management and other departments’ personnel responding to COVID19 efforts instead of using their time for regular operating duties, be an eligible expense?

**Question 58:** Would base pay (regular hours) for Fire, Police, Emergency Management, Public Health, City Management and other departments’ personnel responding to COVID19 efforts instead of using their time for regular operating duties, be an eligible expense?

**Question 59:** Would salary and hourly employee pay for Fire, Police, Emergency Management, Public Health, City Management and other departments’ personnel responding to COVID19 efforts instead of using their time for regular operating duties, be an eligible expense?

**Question 60:** Can a City/County utilize CRF funds to purchase and distribute equipment/supplies related to Covid-19 protection/prevention to a volunteer fire department even if the Department is not directly affiliated with the governmental entity but does service its citizens?
**Question 61:** Are costs for the following program eligible? An unbudgeted program created in response to the COVID-19 emergency to make loans to businesses where funding passes through a Special Purpose District such as a Community Improvement District and/or through an Economic Development Corporation geared to saving local businesses until the COVID-19 crisis has passed and business as usual can resume.

**Question 62:** Is pay for a catastrophic leave policy for the County’s essential employees that were NOT able to use the 80 hours given by the Federal Government in the Family First Coronavirus Response Act due to the nature of their job an eligible cost?

**Question 63:** Will a jurisdiction be able to use an existing contract from another jurisdiction for services and will CARES funding allow reimbursement?

**Question 64:** If a city uses the same, existing contract and vendor used by a neighboring city to distribute funding to small businesses or rent assistance for residents, would those costs be eligible?

**Question 65:** If a city uses the same, existing contract and vendor used by a neighboring city to perform COVID testing for residents, would those costs be eligible?

**Question 66:** May CARES Coronavirus Relief Fund money be used for the FEMA Public Assistance 25% Cost share of Covid-19 grants obligated under Stafford Act Disaster Declaration DR-4485-TX provided the FEMA Covid-19 grants are approved or obligated before 12/31/20 since the 25% cost-share portion would have been incurred before 12/31/20?

**Question 67:** Would the cost to build a new EOC with drive through capabilities for POD’s and testing be an eligible cost?

**Question 68:** Would the cost to purchase a mobile EOC be an eligible cost?

**Question 69:** If an applicant installs a second drive up window at the county tax office in order to maintain social distancing, protect the health of employees and citizens, and operate within the guidelines provided by both the federal and state government, is it an eligible expense?

**Question 70:** Are grants to small businesses to reimburse the costs of business interruption caused by required closures an eligible cost? Where can applicants find guidance regarding the eligibility of grants to small businesses?

**Question 71:** Would the purchase of laptops, I-pads or chrome books to assist the local school district in meeting distance learning objectives during COVID-19 be reimbursable under CRF? If yes, where can applicants find forms and guidance?

**Question 72:** During this event, some applicants' governmental departments have only be open to the public Monday-Wednesday-Friday. However, some employees in those departments have been required to work performing Covid-19 related tasks on Tuesday and Thursday. Are payroll expenses for these employees an eligible cost?

**Question 73:** Are payroll expenses for salaried (exempt) employees that have worked more than usual (for instance 7 days a week, 12-14 hours a day for the last couple of months) an eligible cost?

**Question 74:** Is there a way to assure items will qualify for reimbursement under the guidelines before applicants purchase them?

**Question 75:** Would mechanical CPR devices & accessories for use on an ambulance be eligible costs?
Question 76: Would ventilators & accessories with CPAP/BiPAP capabilities for use on an ambulance be an eligible cost?

Question 77: Is serological testing an eligible cost?

Question 78: Is testing of both employees and their spouses an eligible cost?

Question 79: May Fund payments be used to replace foregone utility fees?

Question 80: Can Fund payments be used as a direct subsidy payment to all utility account holders?

Question 81: Can an animal shelter be funded with the CRF funds?

Question 82: Are the following types of personnel costs eligible costs?
- Backfill
- Paid time off due to quarantine
- Sick time paid due to employees being sent home for 14 days

Question 83: Are radios that we have purchased to improve communications or temperature scanners eligible costs?

Question 84: Are sick leave and admin leave eligible expenses if they pertain to preventing the spread of COVID-19?

Question 85: Would CRF funding cover all the public safety expenses during the pandemic, since they are ensuring the well-being of the community or just when it is a Covid-specific situation?

Question 86: Are the plastic partitions that go on the counter in between the employee and the public an eligible cost?

Question 87: Is there a way for an applicant to confirm a cost will be approved as eligible before spending?

Question 88: Can full payroll/benefits be paid for personnel whose work duties were substantially dedicated to COVID-19, or were on administration leave because of COVID?

Question 89: Is information technology equipment an eligible cost including laptops and video conferencing systems for remote working or to maintain continuity of government?

Question 90: Are the purchase of ambulatory and non-ambulatory vehicles covered under CARES funding if intent of use is for response and reconnaissance of COVID-19 and other infectious diseases patients?

Question 91: Is the cost associated with moving an election from May to November due to COVID-19 an eligible cost?

Question 92: Are there are any guidelines or definitions of the what small business grants should look like that are funded with CRF money?

Question 93: Should applicants create and accept applications for business grants or should applicants simply create a system and allocate funding to local businesses?

Question 94: When an applicant uses CRF money create grants to businesses, what can those businesses do with the money?

Question 95: Is overtime for a deputy to provide masks and monitor temperatures at access points in government buildings an eligible cost?
Question 96: Are personnel costs for exempt employees eligible?

Question 97: Are personnel costs related to COVID sick time for city employees eligible? Are costs related to employees using COVID EFMLA eligible?

Question 98: Does utility assistance only apply to Electric, not Water/Wastewater/Solid Waste?

Question 99: Is specialized equipment for police, inclusive of software, that will enhance social distancing for minor incidents an eligible expense?

Question 100: Would expenses for changes or modification to City facilities to help reduce the spread of COVID-19 such as replacing facility doors for automated doors to avoid touching them or purchase of protective barriers (transparent temporary partitions) be eligible costs?

Question 101: Are laptops that would allow telework be an eligible expense?

Question 102: If an employee had to take time off due to school kids at home or to self-quarantine they are covered, but if they worked from home, salary costs are not eligible because they are doing the job that was already budgeted for in our annual budget. Is that correct?

Question 103: Can an applicant use a portion of this funding toward assisting a local hospital with their payroll expenses? Do it matter whether the hospital is for-profit or non-profit?

Question 104: Are all payroll and benefit expenses for employees dedicated to responding to COVID-19 response eligible, not just overtime?

Question 105: Do eligible straight-time payroll costs only include medical, law enforcement and EMS type payroll? What about other departments whose normal activities have now been dedicated to mitigation roles such as custodial staff, Emergency Management Office/team, and jailers. Would these types of roles also be eligible costs?

Question 106: How do applicants receive approval for additional items that we feel we need to purchase in response to COVID-19 and ensuring that they would be allowable to use CRF funding towards?

Question 107: Would the unbudgeted purchase of an ambulance, specially equipped to handle COVID patients, be an eligible cost?

Question 108: Would the unbudgeted purchase of an ambulance, specially dedicated to use for COVID patients, be an eligible cost?

Question 109: Is employee salary costs for employees who were placed on Administrative Leave with pay due to working rotating shifts or from home to comply with COVID-19 public health precautions an eligible cost?

Question 110: The current Family First Coronavirus Response Act (FFCRA) allows employees up to 80 hours of full or 2/3 leave from April 1, thru December 31, 2020. Is employee’s salaries who qualify for the FFCRA an eligible cost?

Question 111: Is the purchase of new handheld radios to avoid having to share and continually disinfect before releasing to the next shift an eligible cost?

Question 112: Is rental of an ADA accessible trailer for use by a Parks and Recreation department for Summer Programs an eligible cost if that department is prohibited from holding summer camps at locations where camps have previously been held due to COVID-19 restrictions?
Question 113: Can this money be used by a City to provide business assistance for businesses negatively affected by the emergency?

Question 114: Is retroactive payment of hazard pay to Public Safety, Public Works and Parks employees back to March to date an eligible cost?

Question 115: Would the following types of items be eligible costs?
- PPE Stockpile: N95's, Surgical Masks, Isolation Gowns, Shoe Covers, Face shields, Goggles
- SCBA 40 mm respirators and parts
- PAPR (Powered Air Respirators)
- SCBA's
- Computer Automated Dispatch system and related hardware to track COVID cases
- 40 ft. Connex for PPE Storage
- UV Disinfection Cabinet(s), Aeroclave Machine, Portable DECON/pak, CitroSqueeze, Clorox ProQuartinery, Bulk hand-sanitizer

Question 116: Would the following types of items be eligible costs?
- Construction of a decontamination shower at jail/fire station
- Extractor/Dryer (jail/fire station) - washer/Dryer/PPE Dryer

Question 117: Would the following types of items be eligible costs?
- Offices space plexiglass screens for counters
- Computer software (SharePoint or Google Drive) to allow for remote access for employees to work from home
- Wall hand-sanitizer dispensers

Question 118: Would equipment to host open-meetings remotely such as video cameras, recording/streaming software, microphones, and updates to website be eligible costs?

Question 119: Would construction of isolation cells at a Jail be an eligible cost?

Question 120: Would construction of isolation area for exposed first responders (possibly off-site) be an eligible cost?

Question 121: Would construction of drive-thru for Courthouse office staff to utilize to limit public contact be an eligible cost?

Question 122: Would renovations to office space to limit public contact with employees be an eligible cost?

Question 123: Would the purchase of new PC’s with integrated cameras to allow staff to attend remote meetings via Zoom, Google Meet, Microsoft Teams, etc. be an eligible cost?

Question 124: Would hazard pay, for essential employees (first responders), who have been working during the COVID-19 response, be reimbursable under CRF? If so, for what time period?

Question 125: Is administrative leave for non-essential employees an eligible cost?

Question 126: Can CRF funding be used for possible funding for businesses that have been impacted by the COVID crisis?

Question 127: Are expenses for a Physician serving as a health authority/advisor and/or some of his staff
Question 128: How does TDEM define "consulting service agreements" in Section 2.2, Terms and Conditions? Does a local government need to seek approval before it can contract with a 3rd party non-profit to help administer the grant?

Question 129: Would administrative fees associated with a non-profit to administer the program be an eligible cost?

Question 130: Is an increase in employer cost for employee dependent health coverage premiums (employees are adding dependents due to COVID-19 layoffs of their spouses) an eligible cost?

Question 131: Are expenses for housing "paper ready" inmates being held in our jail due to COVID-19 eligible costs?

Question 132: Is overtime that is claimed due to employee out for COVID-19 reasons an eligible cost?

Question 133: Are costs incurred due to employees out on EFMLEA an eligible cost?

Question 134: Is the cost to purchase an ambulance due to increased COVID-19 transports an eligible cost?

Question 135: Is the cost of giving administrative leave to employees due to offices being closed to the public during COVID-19 an eligible cost?

Funding Process Steps and Documentation Requirements

Question 136: By submitting the CRF Certification, does that only trigger the process for the 20% drawdown, or does that also initiate our overall application for reimbursement?

Question 137: If it is only for the automatic drawdown, how does an applicant begin the process of further registering with TDEM to start submitting for reimbursement?

Question 138: How long does it typically take to be approved for the 20% to become available and for the reimbursement process to become available?

Question 139: Is the full reimbursement application going to be through e-grants?

Question 140: What process does a City need to follow to demonstrate costs incurred?

Question 141: After submitting the necessary eligibility certification, does an applicant automatically get the automatic draw down of 20% without having to submit any supporting documentation as per the press release issued by the Governor's Office?

Question 142: If an applicant does not incur expenses (payroll, PPE, supplies, equipment, etc.) that are related to COVID-19 that total the 20% draw down amount, does that applicant have to give the remaining funds back to TDEM?

Question 143: What is the timeline to receive the initial amount of 20%?

Question 144: Should a local jurisdiction continue to follow local procedures? For example, awaiting ratification of Commissioner Court approval prior to submitting documents.

Question 145: Do municipalities need to submit documentation on expenses incurred with the Mayor's
Coronavirus Relief Fund (CRF)

signature form to get the initial 20% of reimbursement?

Question 146: Will the initial 20% will be paid to the counties with no requirement for documentation or expenses and only the second amounts require documentation?

Question 147: We have already identified eligible expenditures, which we are prepared to submit. What are the next steps?

Question 148: Are updates to a website to allow for web payments for utilities an eligible cost?

Question 149: Will an applicant automatically receive the 20% allocation once they submit the initial forms?

Question 150: Will the initial 20% allocation be an upfront distribution? Does uploading the signed Exhibit B initiate that payment?

Question 151: Will the remaining allocation be a reimbursement based only on eligible expenditures?

Question 152: For funding provided for a city's or county's nursing homes, is a receipt from the facility for the items and costs as well as a letter from the facility stating these expenses have not been reimbursed via other funding avenues sufficient to obtain city or county reimbursement?

Question 153: The documents needed to start the process to receive the initial payment from the CRF Grant have been submitted. What are the next steps since we didn’t send in a bank routing number or other financial information?

Question 154: Will applicants have to go in to GMS, Egrants or another grant website to complete an application?

Question 155: What is the time frame for receiving the funds?

Question 156: How often are funds distributed?

Question 157: How does an applicant provide banking information for the electronic transfer?

Question 158: Is there a projected timeline for the funds to be disbursed?

Question 159: Is a resolution adopted by the city council required to apply for the funds or just a signed letter from the mayor?

Question 160: How should applicants submit cost documentation and request reimbursement?

Question 161: How do applicants apply for the remainder of the allotted funds?

Question 162: Do applicants submit as they encumber the expenditures to show documentation of the expense or is the remainder of the grant funds going to be sent to applicants to track as expenditures are made in the future?

Question 163: How should the signed certification be sent in?

Question 164: How soon can I expect a login to the Texas Grants Management System (GMS) to begin filing our claim?

Question 165: Is there a direct deposit form to complete?

Question 166: For applicants located in two or more counties, is the one form sufficient for both counties or does the applicant need to submit forms for each county?
Question 167: Is there anything else that needs to be done in the application process besides filling out the paperwork on the website?

Question 168: Are applicants required to obtain three bids for purchases under $50,000?

Question 169: Is a sample resolution available for the Coronavirus Relief Fund?

Question 170: Do cities with less than 500K in population request CRF funding through TDEM?

Question 171: If small cities and counties do not have funding available to make grants to businesses then ask for reimbursement, how are small cities and counties supposed to help set up such a program to assist small businesses in our counties and cities?

Question 172: When should applicant expect to receive funds?

Question 173: Is there a time estimate for distribution of the first 20% of funding?

Question 174: Is there a time estimate for the reimbursement of the remaining 80% of finding?

Question 175: Can you advise if the funds have already been deposited or when that might be expected? Will applicants be notified of the deposit having been made?

Question 176: How do I know our documentation was submitted properly and what are the next steps?

Question 177: Will applicants just receive the 20% once our terms and conditions have been reviewed? What are the next steps in the process?

Question 178: Will there be someone working with applicants on reimbursement requests for the remaining 80%?

Question 179: How can an applicant know they have submitted all of the required paperwork to get started?

Question 180: What are my next steps to actually submit expenditures?

Question 181: Should an applicant just send the signed Certification Forms or should they also send a Direct Deposit Form?

Question 182: For cities in counties with less than 500,000 population, is the City to work with the county government to receive funding or does that city submit the documentation to TDEM?

Question 183: Is an increase in the amount of supplies purchased in a jail due to COVID-19 an eligible cost? What documentation will be acceptable to reflect an increase in amounts purchased?
Terms and Conditions / Funding Usage Restrictions

Question 184: Regarding the Terms & Conditions – p. 6 – Is a city considered a subrecipient or grantee? Is the State the Grantee and the City the subrecipient?

Question 185: Regarding Terms & Conditions – p. 6 – Would a city have to agree that 75% of their allotment will be spent on medical, public health, and payroll expenses (Categories 1-3)? For a small town with very few cases, this will be a significant limiting factor. Would qualifying expenses in Categories 4-6 be limited because the reimbursement has to be 75% from Categories 1-3?

Question 186: Economic Support – Is there a max limit on how much can be used to support local small businesses?

Question 187: Does “75% of the allotment” refer to 75% of the total allocated to an applicant or is it 75% of actual dollars reimbursed?

Question 188: Do the CARES Act fund usage restrictions refer to Governor Abbott’s position or a statement from the federal government?

Question 189: Is the 75% rule only applicable to TDEM CRF program subrecipients, or are all Treasury recipients required to abide by that?

Question 190: The Terms and Conditions state: The grantee certifies compliance with these eligible expenses by executing the CARES Act Coronavirus Relief Fund Eligibility Certification Form in Exhibit E, which is attached hereto and incorporated for all purposes. I cannot locate an Exhibit E in this document. Is it posted elsewhere?

Question 191: In the detailed examples of eligible expenditures, it states: Expenses to facilitate distance learning, including technological improvements, in connection with school closings to enable compliance with COVID-19 precautions. Schools are closed do to public health initiatives to prevent further spread of the disease. Can up to 75% of these funds be used to support ISD initiatives?

Question 192: What happens to any remaining balance of the 20% allocation? Will applicants be able to keep the unspent funds for eligible expenditures?

Question 193: If the City receives a monetary donation to pay for PPE and/or salaries, can those expenses then be requested under the TDEM/Cares Act?

Question 194: Page 1 of the CRF Certification Form begins with "Exhibit B - CARES Act Coronavirus Relief Fund Eligibility Certification". However, page 3 requires initials for the reception of "Exhibit A - State of Texas Assurances", which is not listed anywhere else on the CRF Certification Form. Is there an updated CRF Certification Form available that includes "Exhibit A - State of Texas Assurances"?

Question 195: Exhibit B reads “In addition to each of the statements above, I acknowledge on submission of this certification that my jurisdiction has incurred eligible expenses between March 1, 2020 and the date noted below.” Can you please advise if this should be a future date or today’s date? If programs are developed to utilize these funds we would not have expended them as of today.
**Question 196:** Page 6 of the Grants Terms and Conditions states. The subrecipient agrees that a minimum of 75% of its allotment will be spent in the categories of medical expenses, public health expenses and payroll expenses for employees substantially dedicated to mitigating or responding to the public emergency. The remainder of the allotment may be spent in any of the categories provided within the Treasury guidance. If a small jurisdiction doesn't spend 75% of its funds on this requirement, will they return all funds back to the State?

**Question 197:** When an applicant receives 20% in the beginning and they find that they don't have cost beyond the initial 20%, would the 75% be of just that 20% amount?

**Question 198:** Are the costs for IT, phones, and computers included in the 75% if they are purchased as part of the COVID-19 response?

**Question 199:** Are there any limits on the amount our entity can grant to local businesses?

**Question 200:** The terms and conditions document mentions administrative services up to 5% - Does this include reimbursement for City/County departments for the time utilized for administrative work directly related to Covid-19 or only outside administrative firms?

**Question 201:** Regarding the Terms and Conditions for the Coronavirus Relief Fund, Section 1.29 (Suspension and Debarment), part a. Should the certification (in the second sentence of 1.29(a)) be that the grantee, grantee’s principals, or affiliates are not excluded or disqualified?

**Question 202:** Do applicants have to return any unused part of the 20% of the initial allocation?

**Question 203:** When is the due date for these funds?

**Question 204:** Are applicants required to spend 75% out of their allotment in the medical, public health and payroll expense categories?

**Question 205:** Under section 1.5 of the terms and conditions are applicants the subrecipient or grantee?

**Question 206:** Under section 1.5 of the terms and conditions, reference is made to Exhibit E – should it be Exhibit B?

**Question 207:** Are applicants able to keep any equipment acquired under this award?

**Question 208:** Will eligible expenses will still be covered if incurred between March 1, 2020 and Dec 30, 2020?

**Question 209:** Can the City Manager certify the grant?

The CRF instructions for populations under 500,000 state the county judge or mayor of the jurisdiction must review, agree to the terms and conditions and sign the certification form. However, the certification form, Exhibit B includes City Manager as well as county judge or mayor to sign the form.

**Question 210:** The TDEM website indicates that the Mayor or County Judge must sign off on the forms but then the forms indicate City Manager as well. Is it okay for the City Manager to sign off on these forms?
Question 211: If a local jurisdiction elects to take the 20% disbursement, does 75% of that amount have to be spent on those categories even though it is only 20% of the total allotment?

Question 212: Given that 75% of the grant funds are to be used for health related purposes leaving 25% for assisting small businesses, is that 25% of the allotment or 25% of the grant request? If an applicant does not reach the 75% level of expenses for health-related purposes can the applicant exceed the 25% for small businesses?

Question 213: The Certification Section has the statement: The undersigned grantee, __________________________ certifies, to the best of his or her knowledge that:

The county or city is actually the grantee and the Judge, Mayor, or City Manager has signatory authority. What should be written in this blank?

Question 214: Are percentages based on total allocation? There’s been confusion on whether or not the threshold is based on total allocation or funds received.

Question 215: On the “Terms and Conditions” document. It has page 22 but then jumps to page 30. What pages are missing in between?

Question 216: How much of the funding allocation is allowed to be utilized towards the humanitarian or business impact needs.

Question 217: The grant agreement states that a minimum of 75% of the allotment will be spent in the categories of medical expenses, public health expenses and payroll expenses. What happens if an applicant accumulates only 50% in expense in those categories, will the funds that have been requested and reimbursed be required to be returned?

Question 218: If an applicant currently does not use E-Verify, can that applicant begin now to use E-Verify and qualify for the CRF funds?

Funding Allocation and Associated Responsibilities

Question 219: Will cities within counties under 500,000 population receive funding directly, or will the funds go to the county government first and the county would then in turn make the funds available to the City?

Question 220: The May 11, 2020 letter says cities and counties should work together. How is the $55 per capita allocation for both the City and the County? Is it $55 for each, or is there an allocation between the City and the County?

Question 221: Some counties are not included in the 20% allocation list on the website. 8 of the 27 counties who have no COVID cases at this time are not listed. What is the rationale utilized to comprise the list?

Question 222: If one application (county and cities within it) is to be submitted through FEMA’s Public Assistance Program (75% match for Category B), does this funding need to be handled the same way, or can each city and the county submit a certification separately?
Question 223: Would a County jurisdiction be held responsible for any misallocation of funds by a City jurisdiction under the CRF process? Does the requirement for each jurisdiction to apply separately from the other to receive their funds alleviate any liability on the part of the County for any City misappropriations, either intentional or otherwise?

Question 224: Upon submitting an intent to participate, is 20% of the City’s allocation paid or is 100% of the City’s allocation paid?

Question 225: Are matching funds required?

Question 226: For the minimum 75% category requirement: If we receive an allocation for $100,000, do we have to first spend $75,000 on the first three categories (medical, public health, and payroll expenses) before being able to spend the remaining $25,000 on the last three categories or can we spend $25,000 on the first three and $25,000 on the last three categories and NOT spend the remaining $50,000?

Question 227: Can a city and an economic development corporation in a community both apply for funds for different projects under the Coronavirus relief fund?

Question 228: If a hospital is a county taxing district on its own, does the city put them under our expenses or should it go to the county? That is, can both city and county CRF be used to support hospital expenses related to COVID that have not been covered by other COVID funding streams?

Question 229: How are funds requested – through the State?

Question 230: Is there a dollar limit on reimbursements?

Question 231: Is there a template resolution that could be utilized if a governmental entity wishes to turn over its allocation to another governmental entity? If not, is there additional guidance on how this should occur?

Question 232: Can individuals apply for funds from the Coronavirus Relief Fund?

Question 233: Are applicants required to spend 75% in categories 1, 2, and 3 before making purchases in the other categories? Does the 75%/25% split apply to the amount spent or the total amount allocated?

Question 234: Is there a way for applicants to track spending?

Question 235: Will forms/spreadsheets be provided to assist us in tracking and submitting the expenses and documentation?

Question 236: How do school districts access CRF funding? Can a County transfer CRF funds to a school district?

Question 237: If a County passes on CRF funding to a school district, would that cause the County to be a pass-thru for dollars going to other entities in the county?
Cities Located in Multiple Counties

**Question 238:** If a city is located within two counties, can the city utilize CRF funding from one county for expenses in the other county?

**Question 239:** If a city is located within two counties, can the city utilize CRF funding from one county to perform testing at a nursing home facility in the other county?

**Question 240:** In the past, cities located within two counties were required by FEMA to complete project worksheets through the county the damage was in but were eventually allowed to submit projects through which ever county was more efficient. Does the same requirement apply for CRF funds?

**Question 241:** If a City is located within more than one county and one of those counties is a jurisdiction that received funds directly from the U.S. Treasury but another is not, what is the appropriate route to seek Coronavirus relief funds?

**Question 242:** If a city spans two different counties, would the city be responsible for requesting all city funds regardless of which county it is located in?

**Question 243:** If a city is located within two counties, can the city utilize CRF funding from one county to purchase PPE for distribution to local businesses in the other county?

Treasury Guidance and Treasury FAQs

**Question 244:** Regarding the FAQs – p. 5 – Which category of expense from the Terms & Conditions would the small business support fall under? I am thinking perhaps #5 – expenses associated with the provision of economic support in connection with the COVID-19 health emergency.

**Question 245:** Regarding CRF Guidance – p. 2 – If a city has an EMS department that could provide emergency medical response and transportation to COVID patients but that department’s operations are budgeted in the most recently approved budget and at this point, there is no change in the schedule or operation of this department due to COVID-19 – would any of the EMS expenses qualify as medical expenses?

**Question 246:** Regarding CRF Guidance – p. 2 – Does this category only include supplies related to public safety employees? If a city installed sneeze guards, bought extra sanitizer, masks, and gloves for personnel who are not medical personnel, police officers, social workers, CPS officers, service providers for older adults or individuals with disabilities, or other public health or safety employees, does this mean these expenses are not considered medical expenses?

**Question 247:** Regarding CRF Guidance – p. 2 – What are “expenses for technical assistance to local authorities” listed in the medical expense category? Could this be legal assistance related to COVID-19 orders? Could this be IT equipment or assistance to setup remote meeting capability for public meetings such as City Council meetings? Or maybe that would fall under “expenses for public safety measures”? 
Coronavirus Relief Fund (CRF)

**Question 248:** On the TDEM CARES Act website under Coronavirus Relief Fund (CRF) FAQs, the following question and response was noted:

**May a unit of local government receiving a Fund payment transfer funds to another unit of government?**

Yes. For example, a county may transfer funds to a city, town, or school district within the county and a county or city may transfer funds to its State, provided that the transfer qualifies as a necessary expenditure incurred due to the public health emergency and meets the other criteria of section 601(d) of the Social Security Act outlined in the Guidance. For example, a transfer from a county to a constituent city would not be permissible if the funds were intended to be used simply to fill shortfalls in government revenue to cover expenditures that would not otherwise qualify as an eligible expenditure.

Given school districts are political subdivisions, does the same answer apply to Councils of Governments (COGs), also political subdivisions? If yes, could any county served by the COG transfer funds to cover necessary expenditures due to the public health emergency (assuming all other criteria as noted above are met)?

**Question 249:** Where can applicants find information and resources?

**Coordination with Other Sources of Funding**

**Question 250:** What is the difference between this grant and the grant that the Governor asked entities to apply for through his office on April 15th: [https://gov.texas.gov/news/post/governor-abbott-announces-38-million-in-federal-covid-19-emergency-funding-for-local-governments](https://gov.texas.gov/news/post/governor-abbott-announces-38-million-in-federal-covid-19-emergency-funding-for-local-governments)

**Question 251:** Is reimbursement for “similar” costs under CRF and FEMA’s Emergency Protective Measures (Category B) allowable under both funding sources? Or do cities need to be bound to one or the other?

**Question 252:** If an applicant were to utilize these funds on a particular item, would that applicant not be eligible to submit for FEMA reimbursement also, once the incident period ends?

**Question 253:** Please provide a quick explanation of the differences and similarities of the funding from CARES and the FEMA grant for COVID-19 funds.

**Question 254:** Who at the state can assist applicants with determining the most efficient and effective manner of utilizing the various Federal funding streams while preventing duplication of benefits?

**Question 255:** Is the funding intended to reimburse 100%? Or is there a “cost share” – if so, what is the split?

**Question 256:** If an entity receives an email regarding the FEMA Public Assistance program, how should the entity proceed?

**Question 257:** Can the 25% matching requirement for the FEMA Public Assistance Program be met by using the CARES Act Coronavirus Relief Funds for local governments?

**Question 258:** For expenses not reimbursable under CRF, is there information on other grants under which they may be reimbursable?
Eligible Costs

**Question 1:** If a local Volunteer Fire Department spent money, that they did not budget for, on PPE and sanitization equipment due to the Coronavirus, would the county be cleared to reimburse them with money it receives if the Volunteer Fire Department is a non-profit agency but the county does support them with some funding?

**Answer**
Yes, this is an eligible expense under the CRF.

**Question 2:** Payroll Expenses – Is Overtime for Law Enforcement and Public Health/Healthcare eligible under this funding?

**Answer**
Yes, if related to COVID-19 and not a budgeted expense.

**Question 3:** What is included as a grant for reimbursement for costs of business interruption? Is that to pay their employees, pay their rent or utilities, purchase operational supplies, etc.?

**Answer**
This would cover expenses related to business interruptions related to COVID required closures.

**Question 4:** Can a City purchase protective equipment for small businesses that can be reimbursed?

**Answer**
This would be covered under #2 Public Health Expenses – Expenses for public safety measures undertaken in response to COVID-19.
Question 5: Regarding payroll expenses and for public safety, food delivery, etc., Exhibit B, 8b states “Were not accounted for in the budget...”. If an applicant has public safety personnel and home food delivery for senior citizens which was switched to substantially dedicated to mitigating COVID-19, but mostly within existing budget, would these expenses not qualify for the $55 per capita allocation?

Answer
No budgeted expenses would be covered under the CRF.

Question 6: Can hazard pay be back paid to employees starting March 1, 2020 to current date if it is not included in this year’s budget?

Answer
Yes, as long as hazard pay is not a budgeted item. CRF funds can’t cover items that are covered in an applicant’s most recent budget (regular salaries/straight time).

Question 7: Would a drop in budgeted revenue qualify?

Answer
Unfortunately, a drop in budgeted revenue does not qualify. On page 16 of the Terms and Conditions document attached, it states:

4.1 Prohibited Costs
A. Funds may not be used to fill shortfalls in government revenue to cover expenditures that would not otherwise qualify under the statute. Revenue replacement is not a permissible use of these grant funds. In accordance with Section 3.1 all record and expenditures are subject to review.

Question 8: The CARES Act Relief Fund Grant Program mentions payroll related to the COVID-19 emergency as an eligible expense. Does that mean straight time and overtime?

Answer
In general, it refers to overtime. However, if an applicant has eligible employees who are working in a substantially different role than their regular job, straight time would be eligible. Please see U.S. Treasury guidance below.

Costs incurred for a “substantially different use” include, but are not necessarily 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. This
would include, for example, the costs of redeploying corrections facility staff to enable compliance with COVID-19 public health precautions through work such as enhanced sanitation or enforcing social distancing measures; the costs of redeploying police to support management and enforcement of stay-at-home orders; or the costs of diverting educational support staff or faculty to develop online learning capabilities, such as through providing information technology support that is not part of the staff or faculty’s ordinary responsibilities.

Note that a public function does not become a “substantially different use” merely because it is provided from a different location or through a different manner. For example, although developing online instruction capabilities may be a substantially different use of funds, online instruction itself is not a substantially different use of public funds than classroom instruction.

**Question 9:** Can an applicant use Coronavirus Relief Fund for the additional cleaning and cleaning products to fight the virus at all of its facilities?

**Answer**
Yes, this would be an eligible cost as long as it is not a part of budgeted cleaning expenses (it would need to be above and beyond, they would need to provide documentation supporting this and it must be for COVID-19).

**Question 10:** Can the funds be used for the purchase of hand sanitizer for all of an applicant’s facilities?

**Answer**
Yes, as long as it's for COVID-19.

**Question 11:** Can the funds be used to pay for government employees to barricade playgrounds?

**Answer**
Yes, if they closed playgrounds as a result of orders on social distancing.
**Question 12:** Can an applicant utilize these funds for contracting with a person to provide childcare, so employees do not miss work when their children lost childcare?

**Answer**
This would be an eligible expense IF it were for employees (public safety, public health, health care, human services, and similar employees whose services are substantially dedicated to mitigating or responding to the COVID19 public health emergency) who are necessary to the function of government.

**Question 13:** Are the funds available for antibody testing of all employees?

**Answer**
Yes.

**Question 14:** Can a city, who receives money under CRF, give some or all of that money to a special water district within their city?

**Answer**
They can if the funds are used for eligible expenses. And, the county would need to ensure they follow the 75% rule, using the first three categories.

**Question 15:** Is there a list out there that shows specific COVID-19 related costs that are eligible for reimbursement?

**Answer**
Guidance can be found on [https://tdem.texas.gov/crf](https://tdem.texas.gov/crf).

**Question 16:** Is the TDEM reimbursement for nursing home testing going to come out of the counties’ allotment of funds or is this going to come from somewhere else?

**Answer**
Federal funds will be used to reimburse for this testing although which specific fund is unclear – it will be whichever is best to maximize the use of funding for everyone.
Question 17: Would this include general employees who are not public safety or healthcare that are responsible for managing reimbursement of COVID-19 funds, managing budgets related to COVID-19 expenditures, purchasing COVID-19 protective equipment, staff who have been cross-trained to operate COVID-19 hotlines or information channels, or public information officers dedicated to keeping the community updated with services offered to help treat, mitigate or respond to COVID-19 public health emergency?

Answer
Please see guidance from the U.S. Treasury: The Guidance states that the Fund may support a “broad range of uses” including payroll expenses for several classes of employees whose services are “substantially dedicated to mitigating or responding to the COVID-19 public health emergency.”

Question 18: If an applicant is over budget on part-time EMS workers who staff an ambulance, could these funds be used to cover the extra cost above the budgeted amount?

Answer
If an applicant has documentation that clearly shows the costs that are above and beyond regular, budgeted expenses (e.g. a contract amendment or something else that documents the additional costs), the additional costs would be eligible.

Question 19: Can the funds be used to pay employee cost of Emergency Management Coordinator for time spent on COVID-19 activities?

Answer
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 COVID19 public health emergency are eligible. These expenses would need to be documented carefully.

Question 20: Can the funds be used to pay employee cost of a City Manager for time spent on COVID-19 activities?

Answer
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 COVID19 public health emergency are eligible. These expenses would need to be documented carefully.
**Question 21:** In an instance where COVID-19 created a need for an EMC to have a dedicated vehicle for the purpose of emergency management; if the vehicle is to be used to conduct COVID surveillance, respond to medical calls, transport equipment, check on and enforce the Governor’s executive orders, and any other COVID related issues that continue to arise would the purchase be an eligible cost?

**Answer**
While it’s possible some of this might pass under CRF guidelines, questions may arise relating to being able to justify an EMC taking on duties outside of their purview. For example, responding to medical calls and enforcing executive orders would most likely fall under EMS or public safety. In such an instance, if an applicant wanted to submit a formal writeup, TDEM could have it reviewed.

**Question 22:** Is administrative leave is an allowable expense under CRF? It appears that it would be given:
5. Expenses associated with the provision of economic support in connection with the COVID-19 public health emergency, and
6. Any other COVID-19-related expenses reasonably necessary to the function of government that satisfy the Fund’s eligibility criteria.

**Answer**
Administrative leave would be an eligible expense if for public safety, public health, health care, human services, and similar employees whose services are substantially dedicated to mitigating or responding to the COVID19 public health emergency.

**Question 23:** What are some examples of types of covered employees?

**Answer**
The Guidance provides examples of broad classes of employees whose payroll expenses would be eligible expenses under the Fund. These classes of employees include 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 and benefit costs associated with public employees who could have been furloughed or otherwise laid off but who were instead repurposed to perform previously unbudgeted functions substantially dedicated to mitigating or responding to the COVID-19 public health emergency are also covered. Other eligible expenditures include payroll and benefit costs of educational support staff or faculty responsible for developing online learning capabilities necessary to continue educational instruction in response to COVID-19-related school closures. Please see the Guidance for a discussion of what is meant by an expense that was not accounted for in the budget most recently approved as of March 27, 2020.
Question 24: Is the category of covered employees strictly to be used for any employee categorized by definition as public safety, public health, or healthcare?

Answer
The Guidance provides examples of broad classes of employees whose payroll expenses would be eligible expenses under the Fund. These classes of employees include 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 and benefit costs associated with public employees who could have been furloughed or otherwise laid off but who were instead repurposed to perform previously unbudgeted functions substantially dedicated to mitigating or responding to the COVID-19 public health emergency are also covered. Other eligible expenditures include payroll and benefit costs of educational support staff or faculty responsible for developing online learning capabilities necessary to continue educational instruction in response to COVID-19-related school closures. Please see the Guidance for a discussion of what is meant by an expense that was not accounted for in the budget most recently approved as of March 27, 2020.

Question 25: Can the City give cash grants for small businesses that can be reimbursed?

Answer
Please see guidance below from the U.S. Treasury on covered costs related to this. Please note that up to 25% of funds can be spent on this category.

Expenses associated with the provision of economic support in connection with the COVID-19 public health emergency, such as:

- Expenditures related to the provision of grants to small businesses to reimburse the costs of business interruption caused by required closures.
- Expenditures related to a State, territorial, local, or Tribal government payroll support program.
- Unemployment insurance costs related to the COVID-19 public health emergency if such costs will not be reimbursed by the federal government pursuant to the CARES Act or otherwise.
Question 26: For a rural county that doesn’t have a hospital, can the funds be used to build a Public Health building that can be used to mitigate the spread of the COVID-19 virus? This building would have exam rooms and bays for drive through testing. The building would be used by our local health official and other medical staff. Can the funds be used for construction of this building as well as the outfitting of medical supplies? If they can, are there certain things outlined that the funds can’t be used for, pertaining to the construction and outfitting?

Answer
It would be difficult to use CRF to pay for a public health building. While this would probably be considered an eligible expense, all funds must be incurred by December 30 of this year. Incurred is defined by the U.S. Treasury as funds being disbursed. Basically, all costs related to the building would have to be spent (e.g. check written) by December 30. It might be possible to take an existing space and turn into a public health building. Applicants interested in this should submit a justification document for review.

Question 27: In an historical building can an applicant install doors and barriers that protect office staff and satisfies the Historical Commission? If these qualify, can they be done in a manner that matches the existing counters and are of lasting quality?

Answer
This would be an eligible expense. The cost would be limited by your allocation. The key thing to remember is that 75% of the funds you spend must be spent on the following three categories:

1. Medical expenses
2. Public health expenses
3. 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.

Question 28: The Guidance says that funding can be used to meet 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. How does a government determine whether payroll expenses for a given employee satisfy the “substantially dedicated” condition?

Answer
The Fund is designed to provide ready funding to address unforeseen financial needs and risks created by the COVID-19 public health emergency. For this reason, and as a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise.
Question 29: The Guidance says that a cost was not accounted for in the most recently approved budget if the cost is for a substantially different use from any expected use of funds in such a line item, allotment, or allocation. What would qualify as a “substantially different use” for purposes of the Fund eligibility?

Answer
Costs incurred for a “substantially different use” include, but are not necessarily 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. This would include, for example, the costs of redeploying corrections facility staff to enable compliance with COVID-19 public health precautions through work such as enhanced sanitation or enforcing social distancing measures; the costs of redeploying police to support management and enforcement of stay-at-home orders; or the costs of diverting educational support staff or faculty to develop online learning capabilities, such as through providing information technology support that is not part of the staff or faculty’s ordinary responsibilities.

Note that a public function does not become a “substantially different use” merely because it is provided from a different location or through a different manner. For example, although developing online instruction capabilities may be a substantially different use of funds, online instruction itself is not a substantially different use of public funds than classroom instruction.

Question 30: Can the City pay for all fire and police personnel cost between March and December or only for time spent on COVID-19 activities for these department?

Answer
Only in the case that these employees were deployed with significantly different job responsibilities related to COVID-19. Please see U.S. Treasury guidance below.

Question: The Guidance says that a cost was not accounted for in the most recently approved budget if the cost is for a substantially different use from any expected use of funds in such a line item, allotment, or allocation. What would qualify as a “substantially different use” for purposes of the Fund eligibility?

Answer: Costs incurred for a “substantially different use” include, but are not necessarily 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. This would include, for example, the costs of redeploying corrections facility staff to enable compliance with COVID-19 public health precautions through work such as enhanced sanitation or enforcing social distancing measures; the costs of redeploying police to support management and enforcement of stay-at-home orders; or the costs of diverting educational support staff or faculty to develop online learning capabilities, such as through providing information technology support that is not part of the staff or faculty’s ordinary responsibilities.
Note that a public function does not become a “substantially different use” merely because it is provided from a different location or through a different manner. For example, although developing online instruction capabilities may be a substantially different use of funds, online instruction itself is not a substantially different use of public funds than classroom instruction.

**Question 31:** Is the purchase of a new medic/ambulance unit eligible under these guidelines if it is to replace an existing ambulance with significant mechanical issues?

**Answer**
Unfortunately, the simple answer is no – it would not be an eligible cost to replace an EMS Unit. One of the requirements is costs related to COVID-19. If there was a scenario where, due to COVID, an applicant has an EMS unit that couldn’t withstand the additional strain for increased calls related to COVID and a new unit was needed, that is a possible yes. There would also be question about any budgeted costs for the EMS unit, particularly if it is replacing a budgeted unit. If the need for this vehicle is directly related to COVID, the applicant should draft a justification and submit for consideration. As a side note, if this became an eligible expense, the applicant would need to purchase and disburse the funds prior to December 30, 2020.

**Question 32:** When a county houses inmates on a state hold while the state is not picking up inmates due to Covid-19, the county is not legally allowed to release the inmates. In this situation, are unbudgeted expenses including medical care covered under CRF even if the inmates are housed past the time the county is statutorily required to house them?

**Answer**

4. Expenses of actions to facilitate compliance with COVID-19-related public health measures, such as:
   - COVID-19-related expenses of maintaining state prisons and county jails, including as relates to sanitation and improvement of social distancing measures, to enable compliance with COVID-19 public health precautions.
Question 33: In reference to the previous question - if so, will the county be able to recover any of the staff time for the jailers?

Answer
The county could claim overtime for jailers through FEMA Category B. Through the CRF, costs could be covered related to COVID-19 but not regular job duties. There is more information on this at the following link from the U.S. Treasury: https://home.treasury.gov/system/files/136/Coronavirus-Relief-Fund-Frequently-Asked-Questions.pdf

Question 34: If the county sets up an economic relief fund to assist small business who were forced to shut down and are now trying to get back on their feet, would these cost be reimbursable through CRF?

Answer
Yes, some expenditures would be covered under U.S. Treasury guidance below and on page 3 #5 at the following link: https://home.treasury.gov/system/files/136/Coronavirus-Relief-Fund-Guidance-for-State-Territorial-Local-and-Tribal-Governments.pdf

Expenses associated with the provision of economic support in connection with the COVID-19 public health emergency, such as:

- Expenditures related to the provision of grants to small businesses to reimburse the costs of business interruption caused by required closures.

Question 35: Can the CRF funds be used for aiding in telecommuting of staff and purchase of tablets/laptops for the conducting of the council meetings?

Answer
**Question 36:** Can CRF funds be used to procure a computer automated dispatch software that would have the capabilities to prompt our dispatch center and responding units as to whether or not a location is affiliated with a positive COVID-19 case and also allow them to relay pertinent information relating to whether or not the person meets the criteria for COVID-19?

**Answer**
While it's possible this could be an eligible expense, questions may arise regarding whether this expense is "necessary" under CRF guidelines. In such an instance, if the applicant wanted to submit a formal write-up, TDEM could have it reviewed.

The Coronavirus Relief Fund Guidance for State, Territorial, Local, and Tribal Governments document issued April 22, 2020 states that eligible expenses include: Medical expenses such as...Emergency medical response expenses...

That said, those costs must also meet the following requirements:
1. They are necessary expenditures incurred due to the public health emergency
2. They are not accounted for in your most recently approved budget
3. The costs must be incurred and expended between 3/1/20 and 12/30/20


**Question 37:** Are the costs to have barriers built in our offices so the public and employees can function safely due to COVID 19 an eligible expense?

**Answer**
This would be an eligible expense. The cost would be limited by your allocation. The key thing to remember is that 75% of the funds you spend must be spent on the following three categories:
1. Medical expenses
2. Public health expenses
3. 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.

**Question 38:** Would the unbudgeted cost of hiring a part time or temporary bathroom monitor to clean/sanitize public restrooms in a courthouse and annex be an eligible cost?

**Answer**
Yes, this would be an eligible cost as long as it is not a part of budgeted cleaning expenses (it would need to be above and beyond, they would need to provide documentation supporting this and it must be for COVID-19).
**Question 39:** Are costs related to technology necessary to Software/hardware to run Zoom meetings due to COVID-19 covered?

**Answer**

**Question 40:** Are costs for tablets for council members to be able to work from home an eligible expense?

**Answer**

**Question 41:** Are updates to a website to allow for web payments for utilities an eligible cost?

**Answer**
While it's possible this could be an eligible expense, questions may arise regarding whether this expense is "necessary" under CRF guidelines. In such an instance, if the applicant wanted to submit a formal write-up, TDEM could have it reviewed.

Keep in mind that the cost must meet the following requirements:
1. It is a necessary expenditure incurred due to the public health emergency
2. It is not accounted for in your most recently approved budget
3. The cost must be incurred and expended between 3/1/20 and 12/30/20

Question 42: Is funding an isolation project for the County jail to increase the current isolation capacity of the current facility an eligible expense? This is basically a renovation project.

Answer
If you could demonstrate that this capital improvement project is a necessary expenditure incurred due to the COVID-19 public health emergency, then such expenses would fall under COVID-19-related expenses of maintaining state prisons and county jails, including as relates to sanitation and improvement of social distancing measures, to enable compliance with COVID-19 public health precautions. However, due to the time involved in construction projects, it may be difficult to use CRF to pay for construction costs. All funds must be incurred by December 30 of this year. Incurred is defined by the U.S. Treasury as funds being disbursed. Basically, all costs related to the building would have to be spent (e.g. check written) by 12/30.

Also keep in mind that such costs do not fall under
1. Medical expenses
2. Public health expenses
3. 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.

So only 25% of the funding allocation can be dedicated to such projects.

Question 43: Is funding a project to add a supplemental permanent exterior addition module to our current jail an eligible expense? This is basically a modular unit attached to our current facility.

Answer
If you could demonstrate that this capital improvement project is a necessary expenditure incurred due to the COVID-19 public health emergency, then such expenses would fall under COVID-19-related expenses of maintaining state prisons and county jails, including as relates to sanitation and improvement of social distancing measures, to enable compliance with COVID-19 public health precautions. It does seem that this could addressed by more temporary measures. Installation of a permanent module would require that you provide documentation making the case that there were no viable temporary alternatives.

Also keep in mind that such costs do not fall under
1. Medical expenses
2. Public health expenses
3. 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.

So only 25% of the funding allocation can be dedicated to such projects.
**Coronavirus Relief Fund (CRF)**

**Question 44:** If an applicant reassigns someone away from their current non-Emergency Management (EM) staff position, to a part time EM position that is COVID focused, is that salary reimbursable?

**Answer**

Only in the case that these employees were deployed with substantially different job responsibilities related to COVID-19. Costs incurred for a “substantially different use” include, but are not necessarily 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. This would include, for example, the costs of redeploying corrections facility staff to enable compliance with COVID-19 public health precautions through work such as enhanced sanitation or enforcing social distancing measures; the costs of redeploying police to support management and enforcement of stay-at-home orders; or the costs of diverting educational support staff or faculty to develop online learning capabilities, such as through providing information technology support that is not part of the staff or faculty’s ordinary responsibilities.

**Question 45:** Is it correct to say that reimbursement for an employee, such as a PIO, who has been working COVID since the declaration, if that is their full time job during “normal” operations, e.g. A County PIO in their normal job position, who now has an increased workload because of COVID, their salary is not reimbursable, but any overtime would be?

**Answer**

Eligible costs include regular straight-time and overtime 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. The Fund is designed to provide ready funding to address unforeseen financial needs and risks created by the COVID-19 public health emergency. For this reason, and as a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise.

**Question 46:** Can both city and county CRF funding be used for their nursing homes to support healthcare and medical expenses to address COVID initiatives that have not been covered by other COVID funding streams?

**Answer**

Yes, this would fall under eligible public health expenses.
Question 47: Is an economic small business grant program an eligible cost? If the grants were provided through a donation through our economic development group is the cost eligible?

Answer

Please see guidance below from the U.S. Treasury on covered costs related to this. Please note that up to 25 percent of funds can be spent on this category.

Expenses associated with the provision of economic support in connection with the COVID-19 public health emergency include:

- Expenditures related to the provision of grants to small businesses to reimburse the costs of business interruption caused by required closures.
- Expenditures related to a State, territorial, local, or Tribal government payroll support program.
- Unemployment insurance costs related to the COVID-19 public health emergency if such costs will not be reimbursed by the federal government pursuant to the CARES Act or otherwise.

Question 48: Would building a structure to house the PPE be an eligible cost?

Answer

If you could demonstrate that this is a necessary expenditure incurred due to the COVID-19 public health emergency, then this would be an eligible expense under Expenses for acquisition and distribution of medical and protective supplies. It does seem that this could addressed by a temporary structure. Installation of a permanent structure would require that you provide documentation making the case that there were no viable temporary alternatives.

Question 49: With regards to qualifying medical expenses – can CRF money be used to pay for eligible expenses at a private (not public) hospital?

Answer

Yes, the CRF allows for the provision of economic support to businesses in connection with the COVID-19 health emergency. However, keep in mind that preventing duplication of benefits is especially problematic for hospitals due to the multiple funding sources provided to hospitals. The CRF funding cannot be used to pay for a cost already being paid by another source of funding including private insurance, Medicare/Medicaid, and hospital billing of patients.
Question 50: Do payroll expenses INCLUDE fringe?

Answer
Yes, this would be included in the 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 COVID19 public health emergency.

Question 51: The guidance documentation states “3. Payroll expenses for public safety, public health, …and similar employees …” – please verify this is straight time reimbursement.

Answer
Eligible costs include regular straight-time and overtime 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 COVID19 public health emergency. The Fund is designed to provide ready funding to address unforeseen financial needs and risks created by the COVID-19 public health emergency. For this reason, and as a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise.

Question 52: Are grants to home owners who are unable to pay pre-defined, legitimate expenses such as their mortgage an eligible expense?

Answer
Per the US Treasury's Coronavirus Relief Fund Frequently Asked Questions
Updated as of May 4, 2020:
Yes, if a government determines such assistance to be a necessary expenditure. Such assistance could include, for example, a program to assist individuals with payment of overdue rent or mortgage payments to avoid eviction or foreclosure or unforeseen financial costs for funerals and other emergency individual needs. Such assistance should be structured in a manner to ensure as much as possible, within the realm of what is administratively feasible, that such assistance is necessary.
Question 53: Are there any set guidelines to follow for grants to businesses; for instance number of employees, revenue annually, or lost revenue?

Answer
Governments have discretion to determine what payments are necessary. A program that is aimed at assisting small businesses with the costs of business interruption caused by required closures should be tailored to assist those businesses in need of such assistance. The amount of a grant to a small business to reimburse the costs of business interruption caused by required closures would also be an eligible expenditure under section 601(d) of the Social Security Act, as outlined in the Guidance.


Question 54: Where can an applicant find guidance in relation to “economic support in connection with the COVID-19 emergency”?

Answer

Question 55: What would qualify as substantially dedicated to mitigating and responding to COVID-19 emergency, for instance 50% or more of staff time?

Answer
Eligible costs include regular straight-time and overtime 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. The Fund is designed to provide ready funding to address unforeseen financial needs and risks created by the COVID-19 public health emergency. For this reason, and as a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise.
**Question 56:** What would qualify as substantially different use from expected use of funds?

**Answer**
Costs incurred for a “substantially different use” include, but are not necessarily 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. This would include, for example, the costs of redeploying corrections facility staff to enable compliance with COVID-19 public health precautions through work such as enhanced sanitation or enforcing social distancing measures; the costs of redeploying police to support management and enforcement of stay-at-home orders; or the costs of diverting educational support staff or faculty to develop online learning capabilities, such as through providing information technology support that is not part of the staff or faculty's ordinary responsibilities.

Note that a public function does not become a “substantially different use” merely because it is provided from a different location or through a different manner. For example, although developing online instruction capabilities may be a substantially different use of funds, online instruction itself is not a substantially different use of public funds than classroom instruction.

**Question 57:** Would Fire, Police, Emergency Management, Public Health, City Management and other departments’ personnel responding to COVID19 efforts instead of using their time for regular operating duties, be an eligible expense?

**Answer**
Eligible costs include regular straight-time and overtime 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. The Fund is designed to provide ready funding to address unforeseen financial needs and risks created by the COVID-19 public health emergency. For this reason, and as a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise.

**Question 58:** Would base pay (regular hours) for Fire, Police, Emergency Management, Public Health, City Management and other departments’ personnel responding to COVID19 efforts instead of using their time for regular operating duties, be an eligible expense?

**Answer**
Yes, eligible costs include regular straight-time and overtime 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. The Fund is designed to provide ready
funding to address unforeseen financial needs and risks created by the COVID-19 public health emergency. For this reason, and as a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise.

**Question 59:** Would salary and hourly employee pay for Fire, Police, Emergency Management, Public Health, City Management and other departments’ personnel responding to COVID19 efforts instead of using their time for regular operating duties, be an eligible expense?

**Answer**
Yes, eligible costs include regular straight-time and overtime 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 COVID19 public health emergency. The Fund is designed to provide ready funding to address unforeseen financial needs and risks created by the COVID-19 public health emergency. For this reason, and as a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise.

**Question 60:** Can a City/County utilize CRF funds to purchase and distribute equipment/supplies related to Covid-19 protection/prevention to a volunteer fire department even if the Department is not directly affiliated with the governmental entity but does service its citizens?

**Answer**
Yes, this would fall under:

- Expenses for acquisition and distribution of medical and protective supplies, including sanitizing products and personal protective equipment, for medical personnel, police officers, social workers, child protection services, and child welfare officers, direct service providers for older adults and individuals with disabilities in community settings, and other public health or safety workers in connection with the COVID-19 public health emergency.
**Question 61:** Are costs for the following program eligible? An unbudgeted program created in response to the COVID-19 emergency to make loans to businesses where funding passes through a Special Purpose District such as a Community Improvement District and/or through an Economic Development Corporation geared to saving local businesses until the COVID-19 crisis has passed and business as usual can resume.

**Answer**
The following guidance statement from the U.S. Treasury on covers costs related to this. Please note that up to 25 percent of funds can be spent on this category.

Expenses associated with the provision of economic support in connection with the COVID-19 public health emergency include:
- Expenditures related to the provision of grants to small businesses to reimburse the costs of business interruption caused by required closures.
- Expenditures related to a State, territorial, local, or Tribal government payroll support program.
- Unemployment insurance costs related to the COVID-19 public health emergency if such costs will not be reimbursed by the federal government pursuant to the CARES Act or otherwise.

**Question 62:** Is pay for a catastrophic leave policy for the County’s essential employees that were NOT able to use the 80 hours given by the Federal Government in the Family First Coronavirus Response Act due to the nature of their job an eligible cost?

**Answer**
Administrative leave would be an eligible expense if for public safety, public health, health care, human services, and similar employees whose services are substantially dedicated to mitigating or responding to the COVID19 public health emergency.

**Question 63:** Will a jurisdiction be able to use an existing contract from another jurisdiction for services and will CARES funding allow reimbursement?

**Answer**
Utilizing another jurisdiction’s existing contract for purchases or services would be referred to as "piggybacking". All costs funded by CRF will be scrutinized for proper procurement and are subject to audit by the Office of the Inspector General. Piggybacking onto an existing contract often violates the normal procurement procedures which are designed to foster full and open competition, ensure reasonable prices, and establish clear scopes of work. As a result, the use of piggybacking is generally discouraged. However, TDEM recognizes the emergency circumstances caused by the public health emergency and the need for jurisdictions to take necessary actions to protect the health of their communities. Even though we
understand that you are going to do what you have to do, expect OIG auditors to look at your documentation of this closely.

See 2 CFR200.320 (f)(2): [https://www.ecfr.gov/cgi-bin/text-idx?SID=751d7e8b49abd691f7324465b08ef8a3&mc=true&amp;node=se2.1.200_1320&amp;rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=751d7e8b49abd691f7324465b08ef8a3&mc=true&amp;node=se2.1.200_1320&amp;rgn=div8)

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### Question 64: If a city uses the same, existing contract and vendor used by a neighboring city to distribute funding to small businesses or rent assistance for residents, would those costs be eligible?

**Answer**

Utilizing another jurisdiction's existing contract for purchases or services would be referred to as "piggybacking". All costs funded by CRF will be scrutinized for proper procurement and are subject to audit by the Office of the Inspector General. Piggybacking onto an existing contract often violates the normal procurement procedures which are designed to foster full and open competition, ensure reasonable prices, and establish clear scopes of work. As a result, the use of piggybacking is generally discouraged. However, TDEM recognizes the emergency circumstances caused by the public health emergency and the need for jurisdictions to take necessary actions to protect the health of their communities. Even though we understand that you are going to do what you have to do, expect OIG auditors to look at your documentation of this closely.

See 2 CFR200.320 (f)(2): [https://www.ecfr.gov/cgi-bin/text-idx?SID=751d7e8b49abd691f7324465b08ef8a3&mc=true&amp;node=se2.1.200_1320&amp;rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=751d7e8b49abd691f7324465b08ef8a3&mc=true&amp;node=se2.1.200_1320&amp;rgn=div8)

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### Question 65: If a city uses the same, existing contract and vendor used by a neighboring city to perform COVID testing for residents, would those costs be eligible?

**Answer**

Utilizing another jurisdiction's existing contract for purchases or services would be referred to as "piggybacking". All costs funded by CRF will be scrutinized for proper procurement and are subject to audit by the Office of the Inspector General. Piggybacking onto an existing contract often violates the normal procurement procedures which are designed to foster full and open competition, ensure reasonable prices, and establish clear scopes of work. As a result, the use of piggybacking is generally discouraged. However, TDEM recognizes the emergency circumstances caused by the public health emergency and the need for jurisdictions to take necessary actions to protect the health of their communities. Even though we understand that you are going to do what you have to do, expect OIG auditors to look at your documentation of this closely.

See 2 CFR200.320 (f)(2): [https://www.ecfr.gov/cgi-bin/text-idx?SID=751d7e8b49abd691f7324465b08ef8a3&mc=true&amp;node=se2.1.200_1320&amp;rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=751d7e8b49abd691f7324465b08ef8a3&mc=true&amp;node=se2.1.200_1320&amp;rgn=div8)
Question 66: May CARES Coronavirus Relief Fund money be used for the FEMA Public Assistance 25% Cost share of Covid-19 grants obligated under Stafford Act Disaster Declaration DR-4485-TX provided the FEMA Covid-19 grants are approved or obligated before 12/31/20 since the 25% cost-share portion would have been incurred before 12/31/20?

Answer
We are awaiting guidance from FEMA and Treasury regarding how Coronavirus Relief Funds may be used for FEMA Public Assistance non-federal share.

Question 67: Would the cost to build a new EOC with drive through capabilities for POD’s and testing be an eligible cost?

Answer
If capital improvement projects are not necessary expenditures incurred due to the COVID-19 public health emergency, then Fund payments may not be used for such projects.

However, Fund payments may be used for the expenses of, for example, establishing temporary public medical facilities and other measures to increase COVID-19 treatment capacity or improve mitigation measures, including related construction costs.

Question 68: Would the cost to purchase a mobile EOC be an eligible cost?

Answer
The CRF funding requires that purchases meet the following criteria:

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

The purchase of a mobile EOC may be an eligible expense under the CRF; however, the cost may be considered unreasonable if there are cost effective alternative solutions. Prior to making a large capital expenditure such as the purchase of a mobile EOC, jurisdictions should document that they have analyzed any lease versus purchase alternatives and performed any other appropriate analyses to determine the most economical approach.

Question 69: If an applicant installs a second drive up window at the county tax office in order to maintain social distancing, protect the health of employees and citizens, and operate within the guidelines provided by both the federal and state government, is it an eligible expense?
Answer
Capital improvement projects must be necessary expenditures incurred due to the COVID-19 public health emergency in order for Fund payments to be used for such projects. In order for these costs to be eligible you would need to be able to demonstrate that these costs were necessary, due to COVID-19, and that there were no other viable or cost-effective temporary measures that could have been taken.

Fund payments may be used for the expenses of, for example, establishing temporary public medical facilities and other measures to increase COVID-19 treatment capacity or improve mitigation measures, including related construction costs.

Question 70: Are grants to small businesses to reimburse the costs of business interruption caused by required closures an eligible cost? Where can applicants find guidance regarding the eligibility of grants to small businesses?

Answer
Yes, that would fall under expenses associated with the provision of economic support in connection with the COVID-19 public health emergency, such as expenditures related to the provision of grants to small businesses to reimburse the costs of business interruption caused by required closures.

The application process consists of completing the following three documents which can be found at https://tdem.texas.gov/crf/

20% of the allocation amount will be sent by electronic funds transfer after receipt of the completed and signed terms and conditions documents and the direct deposit authorization form. However, you will need to provide cost documentation for the first 20% payment as well as documentation for any costs above and beyond that initial 20% prior to requesting additional funds from your allocation. Once funding is received, it may be used for any eligible use under the terms and conditions of the funds. You should maintain documentation supporting the use of the funds for the purposes you have described.
Question 71: Would the purchase of laptops, I-pads or chrome books to assist the local school district in meeting distance learning objectives during COVID-19 be reimbursable under CRF? If yes, where can applicants find forms and guidance?

Answer
Yes, that would be included under expenses to facilitate distance learning, including technological improvements, in connection with school closings to enable compliance with COVID-19 precautions.

Application instructions and forms are available at https://tdem.texas.gov/crf/

Question 72: During this event, some applicants' governmental departments have only been open to the public Monday-Wednesday-Friday. However, some employees in those departments have been required to work performing Covid-19 related tasks on Tuesday and Thursday. Are payroll expenses for these employees an eligible cost?

Answer
The use of payments from the Fund to cover payroll or benefits expenses of public employees are limited to those employees whose work duties are substantially dedicated to mitigating or responding to the COVID-19 public health emergency. As a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise. CRF funding may be used for non-public health and public safety employees if there is adequate documentation available to demonstrate they were working on COVID-19 related tasks and those tasks took up the majority of each employee's time.

Question 73: Are payroll expenses for salaried (exempt) employees that have worked more than usual (for instance 7 days a week, 12-14 hours a day for the last couple of months) an eligible cost?

Answer
The use of payments from the Fund to cover payroll or benefits expenses of public employees are limited to those employees whose work duties are substantially dedicated to mitigating or responding to the COVID-19 public health emergency. As a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise. CRF funding may be used for non-public health and public safety employees if there is adequate documentation available to demonstrate they were working on COVID-19 related tasks and those tasks took up the majority of each employee's time.
**Question 74:** Is there a way to assure items will qualify for reimbursement under the guidelines before applicants purchase them?

**Answer**
The CARES Act provides that payments from the Fund may only be used to cover costs that—
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

If you can demonstrate that such costs were necessary then they would fall under emergency medical response expenses, including emergency medical transportation, related to COVID-19. Maintaining adequate documentation and records is crucial to ensuring that expenditures may not be questioned or recouped in the future.

**Question 75:** Would mechanical CPR devices & accessories for use on an ambulance be eligible costs?

**Answer**
The CARES Act provides that payments from the Fund may only be used to cover costs that—
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

If you can demonstrate that such costs were necessary then they would fall under emergency medical response expenses, including emergency medical transportation, related to COVID-19.

**Question 76:** Would ventilators & accessories with CPAP/BiPAP capabilities for use on an ambulance be an eligible cost?

**Answer**
The CARES Act provides that payments from the Fund may only be used to cover costs that—
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

If you can demonstrate that such costs were necessary then they would fall under emergency medical response expenses, including emergency medical transportation, related to COVID-19.
**Question 77: Is serological testing an eligible cost?**

**Answer**
Costs associated with serological testing for COVID-19 are eligible medical expenses under the CRF.

**Question 78: Is testing of both employees and their spouses an eligible cost?**

**Answer**
Yes, if the costs of these tests are incurred and expended by the city.

**Question 79: May Fund payments be used to replace foregone utility fees?**

**Answer**
Fund payments may not be used to replace foregone utility fees. However, if determined to be a necessary expenditure, a government could provide grants to individuals facing economic hardship to allow them to pay their utility fees and thereby continue to receive essential services.

**Question 80: Can Fund payments be used as a direct subsidy payment to all utility account holders?**

**Answer**
Fund payments may be used for subsidy payments to electricity account holders to the extent that the subsidy payments are deemed by the recipient to be necessary expenditures incurred due to the COVID-19 public health emergency and meet the other criteria of section 601(d) of the Social Security Act outlined in the Guidance.

For example, if determined to be a necessary expenditure, a government could provide grants to individuals facing economic hardship to allow them to pay their utility fees and thereby continue to receive essential services.

A jurisdiction intending to use funds for these purposes should maintain appropriate records of its determination that the subsidies are necessary expenditures and comply with all CRF eligibility criteria.

**Question 81: Can an animal shelter be funded with the CRF funds?**

**Answer**
Costs must be necessary expenditures incurred for actions taken to respond to the public health emergency. Some costs related to animal sheltering may be eligible; for example, the costs of sheltering animals belonging to a hospitalized or quarantined individual. You should maintain adequate documentation to demonstrate the necessity of the expenditure and its connection to the public health emergency.
Question 82: Are the following types of personnel costs eligible costs?
- Backfill
- Paid time off due to quarantine
- Sick time paid due to employees being sent home for 14 days

Answer
Eligible costs include regular straight-time and overtime 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. The Fund is designed to provide ready funding to address unforeseen financial needs and risks created by the COVID-19 public health emergency. For this reason, and as a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise.

Question 83: Are radios that we have purchased to improve communications or temperature scanners eligible costs?

Answer
Eligible public health expenses include expenses for acquisition and distribution of medical and protective supplies, including sanitizing products and personal protective equipment, for medical personnel, police officers, social workers, child protection services, and child welfare officers, direct service providers for older adults and individuals with disabilities in community settings, and other public health or safety workers in connection with the COVID-19 public health emergency. Jurisdictions should maintain adequate documentation to show that the necessity of the purchase of equipment and supplies in response to the public health emergency. While temperature scanners would be eligible, a jurisdiction should be able to justify why the existing radios were not sufficient.

Question 84: Are sick leave and admin leave eligible expenses if they pertain to preventing the spread of COVID-19?

Answer
Expenses of providing paid sick and paid family and medical leave to public employees to enable compliance with COVID-19 public health precautions are one of the non-exclusive examples for the use of funding to facilitate compliance with COVID-19-related public health measures.
**Question 85:** Would CRF funding cover all the public safety expenses during the pandemic, since they are ensuring the well-being of the community or just when it is a Covid-specific situation?

**Answer**
As a matter of administrative convenience, all payroll costs to health and public safety employees are considered COVID-19 related. However, this section only refers to payroll costs. It does not refer to any other non-payroll public safety expenses.

**Question 86:** Are the plastic partitions that go on the counter in between the employee and the public an eligible cost?

**Answer**
This would be an eligible expense. The cost would be limited by your allocation. The key thing to remember is that 75% of the funds you spend must be spent on the following three categories:

1. Medical expenses
2. Public health expenses
3. 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.

**Question 87:** Is there a way for an applicant to confirm a cost will be approved as eligible before spending?

**Answer**
General concerns regarding cost eligibility questions can be emailed to CRF@TDEM.Texas.gov.

Information about cost eligibility is also available in the U.S. Treasury Guidance and Frequently Asked Questions documents which are available for download from https://tdem.texas.gov/crf/

**Question 88:** Can full payroll/benefits be paid for personnel whose work duties were substantially dedicated to COVID-19, or were on administration leave because of COVID?

**Answer**
All 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 are eligible. This includes both overtime and regular pay. Expenses of providing paid sick and paid family and medical leave to public employees to enable compliance with COVID-19 public health precautions are also eligible.
**Question 89:** Is information technology equipment an eligible cost including laptops and video conferencing systems for remote working or to maintain continuity of government?

**Answer**

**Question 90:** Are the purchase of ambulatory and non-ambulatory vehicles covered under CARES funding if intent of use is for response and reconnaissance of COVID-19 and other infectious diseases patients?

**Answer**
The CRF funding requires that purchases meet the following criteria:
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

The purchase of the vehicles may be an eligible expense under the CRF; however, the cost may be considered unreasonable if there are cost effective alternative solutions.

Prior to making a large capital expenditure such as the purchase of these vehicles, jurisdictions should document that they have analyzed any lease versus purchase alternatives and performed any other appropriate analyses to determine the most economical approach.

**Question 91:** Is the cost associated with moving an election from May to November due to COVID-19 an eligible cost?

**Answer**
Eligible expenses include:
"Any other COVID-19-related expenses reasonably necessary to the function of government that satisfy the Fund’s eligibility criteria."

Keep in mind that you would be required to demonstrate that these costs:
1. are necessary expenditures incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID–19);
Coronavirus Relief Fund (CRF)

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.

Also keep in mind that "incurred" here means paid for.

**Question 92:** Are there any guidelines or definitions of the what small business grants should look like that are funded with CRF money?

**Answer**

Please see guidance below from the U.S. Treasury on covered costs related to this. Please note that up to 25 percent of funds can be spent on this category.

Expenses associated with the provision of economic support in connection with the COVID-19 public health emergency include expenditures related to the provision of grants to small businesses to reimburse the costs of business interruption caused by required closures. Please note that the CRF may not be used to pay for damages, including business interruption coverage, covered by insurance.

A program that is aimed at assisting small businesses with the costs of business interruption caused by required closures should be tailored to assist those businesses in need of such assistance.

**Question 93:** Should applicants create and accept applications for business grants or should applicants simply create a system and allocate funding to local businesses?

**Answer**

How the funding in business grants is allocated will be at the city’s discretion provided you comply with the following guidance:

Expenses associated with the provision of economic support in connection with the COVID-19 public health emergency include expenditures related to the provision of grants to small businesses to reimburse the costs of business interruption caused by required closures. Please note that the CRF may not be used to pay for damages, including business interruption coverage, covered by insurance.

A program that is aimed at assisting small businesses with the costs of business interruption caused by required closures should be tailored to assist those businesses in need of such assistance.
Question 94: When an applicant uses CRF money create grants to businesses, what can those businesses do with the money?

Answer
Such funding should be used by businesses to offset costs due to business interruption caused by required closures due to the COVID-19 health emergency.

Question 95: Is overtime for a deputy to provide masks and monitor temperatures at access points in government buildings an eligible cost?

Answer
Yes, as a matter of administrative convenience, all payroll costs to health and public safety employees are considered COVID-19 related. However, this only refers to payroll costs. It does not refer to any other non-payroll public safety expenses.

Question 96: Are personnel costs for exempt employees eligible?

Answer
Fund payments may be used for payroll expenses (including straight time and overtime of both exempt and non-exempt employees) 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. A city may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise. CRF funding may be used for non-public health and public safety employees if there is adequate documentation available to demonstrate they were working on COVID-19 related tasks and those tasks took up the majority of each employee’s time.

Question 97: Are personnel costs related to COVID sick time for city employees eligible? Are costs related to employees using COVID EFMLA eligible?

Answer
Yes, expenses of providing paid sick and paid family and medical leave to public employees to enable compliance with COVID-19 public health precautions are eligible costs. Keep in mind that the Terms and Conditions document specifies that only 25% of the allocated funding can be spent on this category.
Question 98: Does utility assistance only apply to Electric, not Water/Wastewater/Solid Waste?

Answer
If determined to be a necessary expenditure, a government could provide grants to individuals facing economic hardship to allow them to pay their utility fees and thereby continue to receive essential services. This would apply to all utility fees.

However, CRF funding may not simply be kept by the city to replace foregone utility fees.

Question 99: Is specialized equipment for police, inclusive of software, that will enhance social distancing for minor incidents an eligible expense?

Answer
The costs would be eligible; however, the specific category of eligible expense would depend on the type of purchase. Specialized protective equipment for police would be considered public health expenses, assuming the costs are unbudgeted and used in response to COVID-19. Similarly, software to enhance social distancing would be considered an eligible action to facilitate compliance with COVID-19-related public health measures. Keep in mind that the Terms and Conditions document specifies that only 25% of the allocated funding can be spent on this category.

Question 100: Would expenses for changes or modification to City facilities to help reduce the spread of COVID-19 such as replacing facility doors for automated doors to avoid touching them or purchase of protective barriers (transparent temporary partitions) be eligible costs?

Answer
This would be an eligible expense. The cost would be limited by your allocation. The key thing to remember is that 75% of the funds you spend must be spent on the following three categories:
1. Medical expenses
2. Public health expenses
3. 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.
Question 101: Are laptops that would allow telework be an eligible expense?

Answer

Question 102: If an employee had to take time off due to school kids at home or to self-quarantine they are covered, but if they worked from home, salary costs are not eligible because they are doing the job that was already budgeted for in our annual budget. Is that correct?

Answer
That is correct. Salary expense can only be covered for public safety, public health, health care, human services, and similar employees whose services are substantially dedicated to mitigating or responding to the COVID19 public health emergency.

Those job descriptions probably do not include the ability to work from home.

Question 103: Can an applicant use a portion of this funding toward assisting a local hospital with their payroll expenses? Does it matter whether the hospital is for-profit or non-profit?

Answer
Governments may use Fund payments to support public or private hospitals to the extent that the costs are necessary expenditures incurred due to the COVID-19 public health emergency, but the form such assistance would take may differ. In particular, financial assistance to private hospitals could take the form of a grant or a short-term loan.

Question 104: Are all payroll and benefit expenses for employees dedicated to responding to COVID-19 response eligible, not just overtime?

Answer
Eligible costs include regular straight-time and overtime 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 COVID19 public health emergency. The Fund is designed to provide ready funding to address unforeseen financial needs and risks created by the COVID-19 public health emergency. For this reason, and as a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise.
Question 105: Do eligible straight-time payroll costs only include medical, law enforcement and EMS type payroll? What about other departments whose normal activities have now been dedicated to mitigation roles such as custodial staff, Emergency Management Office/team, and jailers. Would these types of roles also be eligible costs?

Answer
CRF funding may be used for non-public health and public safety employees if there is adequate documentation available to demonstrate they were working on COVID-19 related tasks and those tasks took up the majority of each employee's time.

Question 106: How do applicants receive approval for additional items that we feel we need to purchase in response to COVID-19 and ensuring that they would be allowable to use CRF funding towards?

Answer
In order to be eligible, expenses must meet the following basic requirements:

- They are necessary expenditures incurred due to the public health emergency
- They are not accounted for in your most recently approved budget
- The costs must be incurred and expended between 3/1/20 and 12/30/20


Question 107: Would the unbudgeted purchase of an ambulance, specially equipped to handle COVID patients, be an eligible cost?

Answer
The CRF funding requires that purchases meet the following criteria:

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

The purchase of an ambulance may be an eligible expense under the CRF; however, the cost may be considered unreasonable if there are cost effective alternative solutions.

Prior to making a large capital expenditure such as the purchase of an ambulance, jurisdictions should document that they have analyzed any lease versus purchase alternatives and performed any other appropriate analyses to determine the most economical approach.
**Question 108:** Would the unbudgeted purchase of an ambulance, specially dedicated to use for COVID patients, be an eligible cost?

**Answer**
The CRF funding requires that purchases meet the following criteria:

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

The purchase of an ambulance may be an eligible expense under the CRF; however, the cost may be considered unreasonable if there are cost effective alternative solutions.

Prior to making a large capital expenditure such as the purchase of an ambulance, jurisdictions should document that they have analyzed any lease versus purchase alternatives and performed any other appropriate analyses to determine the most economical approach.

**Question 109:** Is employee salary costs for employees who were placed on Administrative Leave with pay due to working rotating shifts or from home to comply with COVID-19 public health precautions an eligible cost?

**Answer**
Administrative leave would be an eligible expense if 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.

**Question 110:** The current Family First Coronavirus Response Act (FFCRA) allows employees up to 80 hours of full or 2/3 leave from April 1, thru December 31, 2020. Are employee’s salaries who qualify for the FFCRA an eligible cost?

**Answer**
Leave other than sick leave is not an eligible cost for CRF funding.

However, expenses of providing paid sick and paid family and medical leave to public employees to enable compliance with COVID-19 public health precautions are eligible.
Question 111: Is the purchase of new hand held radios to avoid having to share and continually disinfect before releasing to the next shift an eligible cost?

Answer
The costs would be eligible provided that you can demonstrate that they are:
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.

Keep in mind that "incurred" here means paid for.

Question 112: Is rental of an ADA accessible trailer for use by a Parks and Recreation department for Summer Programs an eligible cost if that department is prohibited from holding summer camps at locations where camps have previously been held due to COVID-19 restrictions?

Answer
Pre-paying a lease could be a problem due to the following rule: 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. Other than that, the costs would be eligible provided that you can demonstrate that they:
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.

Keep in mind that "incurred" here means paid for.

Question 113: Can this money be used by a City to provide business assistance for businesses negatively effected by the emergency?

Answer
Since small business grants do not fall under any of these categories, they would be limited to 25% of your city's total funding allocation:
1. Medical expenses
2. Public health expenses
3. 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.
A program that is aimed at assisting small businesses with the costs of business interruption caused by required closures should be tailored to assist those businesses in need of such assistance. The amount of a grant to a small business to reimburse the costs of business interruption caused by required closures would also be an eligible expenditure under section 601(d) of the Social Security Act, as outlined in the Guidance.  


**Question 114:** Is retroactive payment of hazard pay to Public Safety, Public Works and Parks employees back to March to date an eligible cost?

**Answer**
Yes, as long as hazard pay is not a budgeted item. CRF funds can’t cover items that are covered in an applicant’s most recent budget (regular salaries/straight time).

**Question 115:** Would the following types of items be eligible costs?
- PPE Stockpile: N95’s, Surgical Masks, Isolation Gowns, Shoe Covers, Face shields, Goggles
- SCBA 40 mm respirators and parts
- PAPR (Powered Air Respirators)
- SCBA’s
- Computer Automated Dispatch system and related hardware to track COVID cases
- 40 ft. Connex for PPE Storage
- UV Disinfection Cabinet(s), Aeroclave Machine, Portable DECON/pak, CitroSqueeze, Clorox ProQuartinery, Bulk hand-sanitizer

**Answer**
The CARES Act provides that payments from the Fund may only be used to cover costs that –
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

If you can demonstrate that such costs were necessary then they would appear to be eligible public health expenses.
Question 116: Would the following types of items be eligible costs?
Construction of a decontamination shower at jail/fire station
Extractor/Dryer (jail/fire station) - washer/Dryer/PPE Dryer

Answer
The CARES Act provides that payments from the Fund may only be used to cover costs that—
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

If you can demonstrate that such costs were necessary and no temporary solution is cost effective or viable, then these costs would appear to be eligible public health expenses.

Question 117: Would the following types of items be eligible costs?
Offices space plexiglass screens for counters
Computer software (SharePoint or Google Drive) to allow for remote access for employees to work from home
Wall hand-sanitizer dispensers

Answer
The CARES Act provides that payments from the Fund may only be used to cover costs that—
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

If you can demonstrate that such costs were necessary then they would appear to be a combination of eligible public health expenses and expenses of actions to facilitate compliance with COVID-19-related public health measures.

Question 118: Would equipment to host open-meetings remotely such as video cameras, recording/streaming software, microphones, and updates to website be eligible costs?

Answer
The CARES Act provides that payments from the Fund may only be used to cover costs that—
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

If you can demonstrate that such costs were necessary then they would appear to be expenses of actions to facilitate compliance with COVID-19-related public health measures.

**Question 119:** Would construction of isolation cells at a Jail be an eligible cost?

**Answer**
The CARES Act provides that payments from the Fund may only be used to cover costs that –

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

If you can demonstrate that such costs were necessary then they would appear to be expenses of actions to facilitate compliance with COVID-19-related public health measures.

Capital improvement projects must be necessary expenditures incurred due to the COVID-19 public health emergency in order for Fund payments to be used for such projects. In order for these costs to be eligible you would need to be able to demonstrate that these costs were necessary, due to COVID-19, and that there were no other viable or cost-effective temporary measures that could have been taken.

**Question 120:** Would construction of isolation area for exposed first responders (possibly off-site) be an eligible cost?

**Answer**
The CARES Act provides that payments from the Fund may only be used to cover costs that –

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

If you can demonstrate that such costs were necessary then they would appear to be expenses of actions to facilitate compliance with COVID-19-related public health measures.

Capital improvement projects must be necessary expenditures incurred due to the COVID-19 public health emergency in order for Fund payments to be used for such projects. In order for these costs to be eligible you would need to be able to demonstrate that these costs were necessary, due to COVID-19, and that there were no other viable or cost-effective temporary measures that could have been taken.
Question 121: Would construction of drive-thru for Courthouse office staff to utilize to limit public contact be an eligible cost?

Answer
The CARES Act provides that payments from the Fund may only be used to cover costs that—
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

If you can demonstrate that such costs were necessary then they would appear to be expenses of actions to facilitate compliance with COVID-19-related public health measures.

Capital improvement projects must be necessary expenditures incurred due to the COVID-19 public health emergency in order for Fund payments to be used for such projects. In order for these costs to be eligible you would need to be able to demonstrate that these costs were necessary, due to COVID-19, and that there were no other viable or cost-effective temporary measures that could have been taken.

Question 122: Would renovations to office space to limit public contact with employees be an eligible cost?

Answer
The CARES Act provides that payments from the Fund may only be used to cover costs that—
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

If you can demonstrate that such costs were necessary then they would appear to be eligible public health expenses.

Question 123: Would the purchase of new PC’s with integrated cameras to allow staff to attend remote meetings via Zoom, Google Meet, Microsoft Teams, etc. be an eligible cost?

Answer
The CARES Act provides that payments from the Fund may only be used to cover costs that—
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

If you can demonstrate that such costs were necessary then they would appear to be expenses of actions to facilitate compliance with COVID-19-related public health measures.

**Question 124:** Would hazard pay, for essential employees (first responders), who have been working during the COVID-19 response, be reimbursable under CRF? If so, for what time period?

**Answer**
Yes, as long as hazard pay is not a budgeted item. CRF funds can't cover items that are covered in an applicant’s most recent budget (regular salaries/straight time). The allowable time frame is March 1, 2020 - December 30, 2020.

**Question 125:** Is administrative leave for non-essential employees an eligible cost?

**Answer**
Administrative leave is not an eligible cost for CRF funding. The only payroll costs eligible are 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 COVID19 public health emergency.

However, expenses of providing paid sick and paid family and medical leave to public employees to enable compliance with COVID-19 public health precautions are eligible.

**Question 126:** Can CRF funding be used for possible funding for businesses that have been impacted by the COVID crisis?

**Answer**
In order to be eligible, expenses must meet the following basic requirements:
- They are necessary expenditures incurred due to the public health emergency
- They are not accounted for in your most recently approved budget
- The costs must be incurred and expended between 3/1/20 and 12/30/20


Expenditures related to the provision of grants to small businesses to reimburse the costs of business interruption caused by required closures would be one type of costs a jurisdiction could spend up to 25% of its allocation towards.
Question 127: Are expenses for a Physician serving as a health authority/advisor and/or some of his staff an eligible cost?

Answer
In order to be eligible, expenses must meet the following basic requirements:
- They are necessary expenditures incurred due to the public health emergency
- They are not accounted for in your most recently approved budget
- The costs must be incurred and expended between 3/1/20 and 12/30/20

The use of CRF funds for these expenses would appear to be eligible 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.

Question 128: How does TDEM define “consulting service agreements” in Section 2.2, Terms and Conditions? Does a local government need to seek approval before it can contract with a 3rd party non-profit to help administer the grant?

Answer
Yes, consulting contracts would include grant administration services and would be subject to the 5% cap and pre-approval of TDEM.

Question 129: Would administrative fees associated with a non-profit to administer the program be an eligible cost?

Answer
The administrative fees would be eligible, provided that they are adequately documented, properly procured, and do not exceed 5% of a jurisdictions’ expenditures.
Question 130: Is an increase in employer cost for employee dependent health coverage premiums (employees are adding dependents due to COVID-19 layoffs of their spouses) an eligible cost?

Answer
In order to be eligible, expenses must meet the following basic requirements:

- They are necessary expenditures incurred due to the public health emergency
- They are not accounted for in your most recently approved budget
- The costs must be incurred and expended between 3/1/20 and 12/30/20


Question 131: Are expenses for housing "paper ready" inmates being held in our jail due to COVID-19 eligible costs?

Answer

4. Expenses of actions to facilitate compliance with COVID-19-related public health measures, such as:
   - COVID-19-related expenses of maintaining state prisons and county jails, including as relates to sanitation and improvement of social distancing measures, to enable compliance with COVID-19 public health precautions.

Question 132: Is overtime that is claimed due to employee out for COVID-19 reasons an eligible cost?

Answer
Eligible expenses include:

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 COVID19 public health emergency.

And

Expenses of providing paid sick and paid family and medical leave to public employees to enable compliance with COVID-19 public health precautions.
However, use of payments from the Fund to cover payroll or benefits expenses of public employees are limited to those employees whose work duties are substantially dedicated to mitigating or responding to the COVID-19 public health emergency.


**Question 133:** Are costs incurred due to employees out on EFMLEA an eligible cost?

**Answer**

Administrative leave is not an eligible cost for CRF funding. The only payroll costs eligible are 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.

However, expenses of providing paid sick and paid family and medical leave to public employees to enable compliance with COVID-19 public health precautions are eligible.

**Question 134:** Is the cost to purchase an ambulance due to increased COVID-19 transports an eligible cost?

**Answer**

The CRF funding requires that purchases meet the following criteria:

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

The purchase of an ambulance may be an eligible expense under the CRF; however, the cost may be considered unreasonable if there are cost effective alternative solutions.

Prior to making a large capital expenditure such as the purchase of an ambulance, jurisdictions should document that they have analyzed any lease versus purchase alternatives and performed any other appropriate analyses to determine the most economical approach.
Question 135: Is the cost of giving administrative leave to employees due to offices being closed to the public during COVID-19 an eligible cost?

Answer
Administrative leave is not an eligible cost for CRF funding. The only payroll costs eligible are 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.

However, expenses of providing paid sick and paid family and medical leave to public employees to enable compliance with COVID-19 public health precautions are eligible.

Funding Process Steps and Documentation Requirements

Question 136: By submitting the CRF Certification, does that only trigger the process for the 20% drawdown, or does that also initiate our overall application for reimbursement?

Answer
This triggers the process to receive the initial 20% drawdown. You will need to submit supporting documentation for this initial amount prior to requesting reimbursement for additional allocation amounts.

Question 137: If it is only for the automatic drawdown, how does an applicant begin the process of further registering with TDEM to start submitting for reimbursement?

Answer
You should start with providing documentation for the initial 20% allocation.

Question 138: How long does it typically take to be approved for the 20% to become available and for the reimbursement process to become available?

Answer
As soon as TDEM receives your form and direct deposit information, the funding will be processed. This takes about five days (after initial documentation is received).
Question 139: Is the full reimbursement application going to be through e-grants?

Answer
TDEM will not be using eGrants for the CRF. TDEM will process funding through the TDEM Grants Management System (GMS).

Question 140: What process does a City need to follow to demonstrate costs incurred?

Answer
TDEM staff in the field can assist directly with any questions on documentation.

Question 141: After submitting the necessary eligibility certification, does an applicant automatically get the automatic draw down of 20% without having to submit any supporting documentation as per the press release issued by the Governor’s Office?

Answer
Yes, but they will still need to provide documentation for this initial 20%. If they request additional funds from their entire allocation, they will need to provide documentation for this initial 20% prior to receiving additional funds.

Question 142: If an applicant does not incur expenses (payroll, PPE, supplies, equipment, etc.) that are related to COVID-19 that total the 20% draw down amount, does that applicant have to give the remaining funds back to TDEM?

Answer
Yes, all funding not spent on eligible expenses with documentation must be returned to the state.

Question 143: What is the timeline to receive the initial amount of 20%?

Answer
As soon as TDEM has the certification signed and direct deposit paperwork, TDEM estimates it will be sent via electronic funds transfer in about a week.
Answer
Local approval procedures still apply to CRF funds. TDEM will not direct local jurisdictions on what their processes are.

**Question 145**: Do municipalities need to submit documentation on expenses incurred with the Mayor’s signature form to get the initial 20% of reimbursement?

**Answer**
The only documentation needed to process the initial 20% payment is to fill out the terms and conditions (last three signature pages). This 20% will be sent by electronic funds transfer when completed. However, you will need to provide documentation for the first 20% payment prior to requesting additional funds from your allocation. In simple terms, you will need to provide documentation that proves the money is spent on eligible costs as outlined in the terms and conditions. An example could be an invoice and proof of payment for purchase of personal protective equipment (PPE). This would mean you could submit the detailed invoice that outlines what is being purchased (so the state can verify the purchases fall under eligible costs) and then proof that the city made payment. Another example would be if you were to use funds on paying for city staff overtime related to COVID. The city would need to provide documentation (usually from whatever timekeeping system that is used) on each employee, regular hours worked, overtime hours worked and generally a pay policy.

**Question 146**: Will the initial 20% will be paid to the counties with no requirement for documentation or expenses and only the second amounts require documentation?

**Answer**
Documentation is required with both the 20% initial payment and the remaining part of the allocation. The difference is that jurisdictions will receive 20% up front and will provide documentation for that 20% “after the fact.” If they need additional funds above the 20%, they will have to provide documentation for the first 20% before receiving a second allocation. TDEM is working to make it as painless as possible, but the state ultimately has to guarantee, to the federal government, that the funds were spent on eligible costs and used appropriately.
Question 147: We have already identified eligible expenditures, which we are prepared to submit. What are the next steps?

Answer
Please submit the Direct Deposit Authorization immediately. TDEM staff and affiliates are currently focused on the prompt distribution of the initial 20% funding to eligible applicants. When TDEM begins distribution of the remaining funding, applicants will be briefed on the steps for uploading cost documentation into the Texas Grants Management System (GMS) as well as submitting a Request for Reimbursement in GMS.

Question 148: Are updates to a website to allow for web payments for utilities an eligible cost?

Answer
While it’s possible this could be an eligible expense, questions may arise regarding whether this expense is “necessary” under CRF guidelines. In such an instance, if the applicant wanted to submit a formal write-up, TDEM could have it reviewed.

Keep in mind that the cost must meet the following requirements:
1. It is a necessary expenditure incurred due to the public health emergency
2. It is not accounted for in your most recently approved budget
3. The cost must be incurred and expended between 3/1/20 and 12/30/20


Question 149: Will an applicant automatically receive the 20% allocation once they submit the initial forms?

Answer
20% of the allocation amount will be sent by electronic funds transfer after receipt of the completed and signed terms and conditions documents and the direct deposit authorization form. However, the city will need to provide cost documentation for the first 20% payment as well as documentation for any costs above and beyond that initial 20% prior to requesting additional funds from the city’s allocation.
Question 150: Will the initial 20% allocation be an upfront distribution? Does uploading the signed Exhibit B initiate that payment?

Answer
Yes, uploading the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form triggers the process to receive the initial 20 percent drawdown. You will need to submit supporting documentation for this initial amount prior to requesting reimbursement for additional allocation amounts.

Question 151: Will the remaining allocation be a reimbursement based only on eligible expenditures?

Answer
Yes, you will need to submit supporting documentation for the initial 20% and any additional costs beyond that prior to receiving reimbursement for additional allocation amounts.

Question 152: For funding provided for a city’s or county’s nursing homes, is a receipt from the facility for the items and costs as well as a letter from the facility stating these expenses have not been reimbursed via other funding avenues sufficient to obtain city or county reimbursement?

Answer
Standard documentation requirements for federal funding would apply including procurement documentation, proof of expenditure (the receipt you mentioned), and proof the nursing home paid the cost (i.e. a cancelled check or similar proof).

Question 153: The documents needed to start the process to receive the initial payment from the CRF Grant have been submitted. What are the next steps since we didn’t send in a bank routing number or other financial information?

Answer
Uploading the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form triggers the process to receive the initial 20 percent drawdown. You should provide the financial information by completing the Direct Deposit Authorization document which can be found at: https://tdem.texas.gov/crf/
**Question 154:** Will applicants have to go in to GMS, Egrants or another grant website to complete an application?

**Answer**

The application is complete when you have submitted the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form. TDEM will not be using eGrants for the CRF. However, TDEM will process funding through the TDEM Grants Management System (GMS).

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**Question 155:** What is the time frame for receiving the funds?

**Answer**

As soon as TDEM receives your signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form, the funding will be processed. This takes about five days (after initial documentation is received).

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**Question 156:** How often are funds distributed?

**Answer**

Once an applicant submits the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form 20% of the available funding is advanced within approximately 5 business days. The remaining funding is provided on a reimbursement basis as applicants provide expense documentation. The forms mentioned can be found at the TDEM CRF website: [https://tdem.texas.gov/crf/](https://tdem.texas.gov/crf/)

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**Question 157:** How does an applicant provide banking information for the electronic transfer?

**Answer**

Please provide that information by downloading the Direct Deposit Authorization form from the TDEM CRF website: [https://tdem.texas.gov/crf/](https://tdem.texas.gov/crf/)

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**Question 158:** Is there a projected timeline for the funds to be disbursed?

**Answer**

As soon as TDEM receives your signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form, the initial 20% funding will be processed. This takes about five days (after initial documentation is received). The remaining funding will be disbursed on a Request for Reimbursement basis.
**Question 159:** Is a resolution adopted by the city council required to apply for the funds or just a signed letter from the mayor?

**Answer**
TDEM will not dictate local procedures. Use whatever local procedure is standard for your jurisdiction. That said, TDEM does require the following documents be completed and submitted: Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form. Submission of these documents constitutes the request for assistance for his funding.

**Question 160:** How should applicants submit cost documentation and request reimbursement?

**Answer**
TDEM staff and affiliates are currently focused on the prompt distribution of the initial 20% funding to eligible applicants. When TDEM begins distribution of the remaining funding, applicants will be briefed on the steps for uploading cost documentation into the Texas Grants Management System (GMS) as well as submitting a Request for Reimbursement in GMS.

**Question 161:** How do applicants apply for the remainder of the allotted funds?

**Answer**
TDEM staff and affiliates are currently focused on the prompt distribution of the initial 20% funding to eligible applicants. When TDEM begins distribution of the remaining funding, applicants will be briefed on the steps for uploading cost documentation into the Texas Grants Management System (GMS) as well as submitting a Request for Reimbursement in GMS.

**Question 162:** Do applicants submit as they encumber the expenditures to show documentation of the expense or is the remainder of the grant funds going to be sent to applicants to track as expenditures are made in the future?

**Answer**
TDEM staff and affiliates are currently focused on the prompt distribution of the initial 20% funding to eligible applicants. When TDEM begins distribution of the remaining funding, applicants will be briefed on the steps for uploading cost documentation into the Texas Grants Management System (GMS) as well as submitting a Request for Reimbursement in GMS.
Question 163: How should the signed certification be sent in?

Answer
Please email the completed, signed forms to CRF@TDEM.TEXAS.GOV.

If you are having trouble emailing the forms, you can find an upload link at the bottom of the TDEM Coronavirus Relief Fund webpage: [https://tdem.texas.gov/crf/](https://tdem.texas.gov/crf/)

Question 164: How soon can I expect a login to the Texas Grants Management System (GMS) to begin filing our claim?

Answer
TDEM staff and affiliates are currently focused on the prompt distribution of the initial 20% funding to eligible applicants. When TDEM begins distribution of the remaining funding, applicants will be briefed on the steps for uploading cost documentation into the Texas Grants Management System (GMS) as well as submitting a Request for Reimbursement in GMS.

Question 165: Is there a direct deposit form to complete?

Answer
Yes, the Direct Deposit Form is available for download at [https://tdem.texas.gov/crf/](https://tdem.texas.gov/crf/)
You will find it near the top of the webpage.

Question 166: For applicants located in two or more counties, is the one form sufficient for both counties or does the applicant need to submit forms for each county?

Answer
One form is sufficient for both counties, however your city may receive funding as two separate payments, one for each county.

Question 167: Is there anything else that needs to be done in the application process besides filling out the paperwork on the website?

Answer
As soon as TDEM receives your signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form, the initial 20% funding will be processed. This takes about five days (after initial documentation is received). The remaining funding will be disbursed on a Request for Reimbursement basis.
Question 168: Are applicants required to obtain three bids for purchases under $50,000?

Answer
Purchases made using Federal Funding under that amount do not require bids. In this instance please follow your written procurement policy.

Question 169: Is a sample resolution available for the Coronavirus Relief Fund?

Answer
A sample resolution is unavailable. The city should follow its standard procedures to ensure the individual completing the application has the legal authority to certify and enter into agreements on the city’s behalf.

Question 170: Do cities with less than 500K in population request CRF funding through TDEM?

Answer
Yes. Application for this funding consists of submitting the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form. At that point 20% of the available funding is advanced within approximately 5 business days. The remaining funding is provided on a reimbursement basis as applicants provide expense documentation. The forms mentioned can be found at the TDEM CRF website: https://tdem.texas.gov/crf/ completing the application has the legal authority to certify and enter into agreements on the city’s behalf.

Question 171: If small cities and counties do not have funding available to make grants to businesses then ask for reimbursement, how are small cities and counties supposed to help set up such a program to assist small businesses in our counties and cities?

Answer
The initial advance of 20% funding is intended to get that funding started. Keep in mind that the total allowed to be used for such business grants according to the Terms and Conditions document is 25% of the funding allocation. So you will be advanced nearly all that you are allowed to use for this purpose upon initiation of the funding.
**Question 172:** When should applicant expect to receive funds?

**Answer**
Once an applicant submits the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form 20% of the available funding is advanced within approximately 5 business days. The remaining funding is provided on a reimbursement basis as applicants provide expense documentation. The forms mentioned can be found at the TDEM CRF website: [https://tdem.texas.gov/crf/](https://tdem.texas.gov/crf/)

**Question 173:** Is there a time estimate for distribution of the first 20% of funding?

**Answer**
Once an applicant submits the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form 20% of the available funding is advanced within approximately 5 business days. The remaining funding is provided on a reimbursement basis as applicants provide expense documentation. The forms mentioned can be found at the TDEM CRF website: [https://tdem.texas.gov/crf/](https://tdem.texas.gov/crf/)

**Question 174:** Is there a time estimate for the reimbursement of the remaining 80% of funding?

**Answer**
TDEM has the responsibility for ensuring all funds are spent for eligible uses and will be reviewing reimbursement requests and their supporting documentation to make those determinations. TDEM understands the rapid needs associated with CARES Act funding and will review all reimbursement requests as expeditiously as possible.

**Question 175:** Can you advise if the funds have already been deposited or when that might be expected? Will applicants be notified of the deposit having been made?

**Answer**
Once an applicant submits the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form 20% of the available funding is advanced within approximately 5 business days. The remaining funding is provided on a reimbursement basis as applicants provide expense documentation. The forms mentioned can be found at the TDEM CRF website: [https://tdem.texas.gov/crf/](https://tdem.texas.gov/crf/)

**Question 176:** How do I know our documentation was submitted properly and what are the next steps?

**Answer**
Once an applicant submits the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form 20% of the available funding is advanced within approximately 5 business days. The remaining funding is provided on a reimbursement basis as applicants provide expense documentation. The forms mentioned can be found at the TDEM CRF website: [https://tdem.texas.gov/crf/](https://tdem.texas.gov/crf/)
Question 177: Will applicants just receive the 20% once our terms and conditions have been reviewed? What are the next steps in the process?

Answer
Once an applicant submits the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form 20% of the available funding is advanced within approximately 5 business days. The remaining funding is provided on a reimbursement basis as applicants provide expense documentation. When TDEM begins distribution of the remaining funding, applicants will be briefed on the steps for uploading cost documentation into the Texas Grants Management System (GMS) as well as submitting a Request for Reimbursement in GMS.

The forms mentioned can be found at the TDEM CRF website: https://tdem.texas.gov/crf/

Question 178: Will there be someone working with applicants on reimbursement requests for the remaining 80%?

Answer
Yes, TDEM Regional Unit Chiefs, TDEM Field Staff and TDEM contractor affiliates will work with you to process the reimbursement requests.

Question 179: How can an applicant know they have submitted all of the required paperwork to get started?

Answer
Once an applicant submits the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form 20% of the available funding is advanced within approximately 5 business days. The remaining funding is provided on a reimbursement basis as applicants provide expense documentation. The forms mentioned can be found at the TDEM CRF website: https://tdem.texas.gov/crf/

Question 180: What are my next steps to actually submit expenditures?

Answer
TDEM staff and affiliates are currently focused on the prompt distribution of the initial 20% funding to eligible applicants. When TDEM begins distribution of the remaining funding, applicants will be briefed on the steps for uploading cost documentation into the Texas Grants Management System (GMS) as well as submitting a Request for Reimbursement in GMS.
Once an applicant submits the signed Terms and Conditions document, Exhibit B, and the Direct Deposit Authorization form 20% of the available funding is advanced within approximately 5 business days. The remaining funding is provided on a reimbursement basis as applicants provide expense documentation. The forms mentioned can be found at the TDEM CRF website: https://tdem.texas.gov/crf/

If the county wishes to yield a portion of its allocation to the city, the county should submit an official request on its letterhead to CRF@TDEM.Texas.gov.

TDEM staff in the field can assist directly with any questions on documentation.

In order to be eligible, expenses must meet the following basic requirements:

- They are necessary expenditures incurred due to the public health emergency
- They are not accounted for in your most recently approved budget
- The costs must be incurred and expended between 3/1/20 and 12/30/20

Terms and Conditions / Funding Usage Restrictions

**Question 184:** Regarding the Terms & Conditions – p. 6 – Is a city considered a subrecipient or grantee? Is the State the Grantee and the City the subrecipient?

**Answer**
In relation to this document, the city would be the grantee.

**Question 185:** Regarding Terms & Conditions – p. 6 – Would a city have to agree that 75% of their allotment will be spent on medical, public health, and payroll expenses (Categories 1-3)? For a small town with very few cases, this will be a significant limiting factor. Would qualifying expenses in Categories 4-6 be limited because the reimbursement has to be 75% from Categories 1-3?

**Answer**
Yes, 75% of the funds must be spent on Categories 1-3.

**Question 186:** Economic Support – Is there a max limit on how much can be used to support local small businesses?

**Answer**
Yes, there is a maximum limit. 75% of the funds used from the allocation must be used on the first three categories outlined in guidance documents and the terms and conditions: medical expenses, public health expenses and eligible personnel expenses. The area that supports small businesses is one of three categories for which 25% of the funds can be used.

**Question 187:** Does “75% of the allotment” refer to 75% of the total allocated to an applicant or is it 75% of actual dollars reimbursed?

**Answer**
The requirement to spend 75% on the first three Coronavirus Relief Fund (CRF) categories applies to any part of the allocation that is spent. If an applicant was only to spend $10,000 of their CRF allocation, 75% of the $10,000 should be spent on the first three categories.
Question 188: Do the CARES Act fund usage restrictions refer to Governor Abbott’s position or a statement from the federal government?

Answer
The Coronavirus Relief Fund (CRF) portion of the CARES ACT outlined the following three requirements:

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 for the state or government; and
3. Were incurred during the period that begins on March 1, 2020 and ends on December 30, 2020.

This is not related to a statement from Governor Abbott or a statement from the federal government, but written into law. As a result of that law, all funds related to CRF must be COVID-19 related.

Question 189: Is the 75% rule only applicable to TDEM CRF program subrecipients, or are all Treasury recipients required to abide by that?

Answer
The requirement to spend 75% of funds on the following categories is a requirement for applicants requesting funds through TDEM:

1. Medical expenses
2. Public health expenses
3. 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

Question 190: The Terms and Conditions state: The grantee certifies compliance with these eligible expenses by executing the CARES Act Coronavirus Relief Fund Eligibility Certification Form in Exhibit E, which is attached hereto and incorporated for all purposes. I cannot locate an Exhibit E in this document. Is it posted elsewhere?

Answer
The reference to Exhibit E appears to be a typo. The CARES Act Coronavirus Relief Fund Eligibility Certification form is exhibit B which can be downloaded from the TDEM Coronavirus Relief Fund website at: https://tdem.texas.gov/wp-content/uploads/2019/08/CRF-Certification-Signature-Pages.pdf
Question 191: In the detailed examples of eligible expenditures, it states: Expenses to facilitate distance learning, including technological improvements, in connection with school closings to enable compliance with COVID-19 precautions. Schools are closed due to public health initiatives to prevent further spread of the disease. Can up to 75% of these funds be used to support ISD initiatives?

Answer
No, Expenses to facilitate distance learning fall under the remaining 25% since they are not:

1. Medical expenses
2. Public health expenses
3. 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.


Question 192: What happens to any remaining balance of the 20% allocation? Will applicants be able to keep the unspent funds for eligible expenditures?

Answer
Applicants are to utilize the initial 20% as well as the remaining 80% toward costs eligible under the Coronavirus Relief Fund. Any funds left unspent on eligible costs by 12/30/2020 must be returned to the state.

Question 193: If the City receives a monetary donation to pay for PPE and/or salaries, can those expenses then be requested under the TDEM/Cares Act?

Answer
If the donations were specified for the same item requested for funding by CRF, then no. The costs would not also be eligible for reimbursement under the CRF. Federal law prohibits duplication of benefits - using both funds for the same cost. Donations are considered a source of funding for determination of duplication of benefits. Also keep in mind that CRF rules prohibit reimbursement to donors for donated items or services.
**Question 194:** Page 1 of the CRF Certification Form begins with "Exhibit B - CARES Act Coronavirus Relief Fund Eligibility Certification". However, page 3 requires initials for the reception of "Exhibit A - State of Texas Assurances", which is not listed anywhere else on the CRF Certification Form. Is there an updated CRF Certification Form available that includes "Exhibit A - State of Texas Assurances"?

**Answer**

**Question 195:** Exhibit B reads “In addition to each of the statements above, I acknowledge on submission of this certification that my jurisdiction has incurred eligible expenses between March 1, 2020 and the date noted below.” Can you please advise if this should be a future date or today’s date? If programs are developed to utilize these funds, we would not have expended them as of today.

**Answer**
The date entered below the signature should be the date the document was signed.

**Question 196:** Page 6 of the Grants Terms and Conditions states
The subrecipient agrees that a minimum of 75% of its allotment will be spent in the categories of medical expenses, public health expenses and payroll expenses for employees substantially dedicated to mitigating or responding to the public emergency. The remainder of the allotment may be spent in any of the categories provided within the Treasury guidance.

If a small jurisdiction doesn’t spend 75% of its funds on this requirement, will they return all funds back to the State?

**Answer**
In order to be eligible, 75 percent of the expenses must fall within the first three Coronavirus Relief Fund (CRF) categories. The requirement to spend 75 percent on the first three Coronavirus Relief Fund (CRF) categories applies to any part of the allocation that is spent. If an applicant was only to spend $10,000 of their CRF allocation, 75 percent of the $10,000 should be spent on the first three categories. All funding not spent on eligible expenses with documentation must be returned to the state.
**Question 197:** When an applicant receives 20% in the beginning and they find that they don’t have cost beyond the initial 20%, would the 75% be of just that 20% amount?

**Answer**
Yes, the requirement to spend 75 percent on the first three Coronavirus Relief Fund (CRF) categories applies to any part of the allocation that is spent. If an applicant was only to spend $10,000 of their CRF allocation, 75 percent of the $10,000 should be spent on the first three categories.

**Question 198:** Are the costs for IT, phones, and computers included in the 75% if they are purchased as part of the COVID-19 response?

**Answer**
Computer and IT expenses such as those to facilitate telework for public employees or technological improvements to facilitate distance learning for schools are eligible but fall under the other CRF categories which can only comprise a maximum of 25% of the claimed costs.

**Question 199:** Are there any limits on the amount our entity can grant to local businesses?

**Answer**
Since small business grants do not fall under any of these categories, they would be limited to 25% of your city's total funding allocation:
1. Medical expenses
2. Public health expenses
3. 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.

**Question 200:** The terms and conditions document mentions administrative services up to 5% - Does this include reimbursement for City/County departments for the time utilized for administrative work directly related to Covid-19 or only outside administrative firms?

**Answer**
Per the Terms and Conditions document: Pre-approval of costs related to consulting contracts is required and the value of consulting contracts entered into by the grantee may not exceed 5% of the total funds received by the local unit of government.

This section pertains only to consulting contracts.
Question 201: Regarding the Terms and Conditions for the Coronavirus Relief Fund, Section 1.29 (Suspension and Debarment), part a. Should the certification (in the second sentence of 1.29(a)) be that the grantee, grantee’s principals, or affiliates are not excluded or disqualified?

Answer
You are correct. It appears the word "not" was inadvertently left out of that section.

Question 202: Do applicants have to return any unused part of the 20% of the initial allocation?

Answer
Yes, all funding not spent on eligible expenses with documentation must be returned to the state.

Question 203: When is the due date for these funds?

Answer
All costs must be incurred and expended between March 1, 2020 and December 30, 2020.

Question 204: Are applicants required to spend 75% out of their allotment in the medical, public health and payroll expense categories?

Answer
The requirement to spend 75 percent on the first three Coronavirus Relief Fund (CRF) categories applies to any part of the allocation that is spent. If an applicant was only to spend $10,000 of their CRF allocation, 75 percent of the $10,000 should be spent on the first three categories.

Question 205: Under section 1.5 of the terms and conditions are applicants the subrecipient or grantee?

Answer
Both. In this document the terms grantee and subrecipient have the same meaning and are used interchangeably.

Question 206: Under section 1.5 of the terms and conditions, reference is made to Exhibit E – should it be Exhibit B?

Answer
The reference to Exhibit E appears to be a typo. The CARES Act Coronavirus Relief Fund Eligibility Certification form is exhibit B which can be downloaded from the TDEM Coronavirus Relief Fund website at: https://tdem.texas.gov/wp-content/uploads/2019/08/CRF-Certification-Signature-Pages.pdf
**Question 207:** Are applicants able to keep any equipment acquired under this award?

**Answer**
Yes, if the purchase of the asset was consistent with the limitations on the eligible use of funds provided by section 601(d) of the Social Security Act. However, if such assets are disposed of prior to December 30, 2020, the proceeds would be subject to the restrictions on the eligible use of payments from the Fund provided by section 601(d) of the Social Security Act. As noted, equipment disposition requirements pursuant to 2 CFR 200.313 apply. Therefore, please contact TDEM at such time as you wish to dispose of any equipment over $5,000 purchased with CRF funds.

**Question 208:** Will eligible expenses will still be covered if incurred between March 1, 2020 and Dec 30, 2020?

**Answer**
Eligible expenses will be covered if incurred and paid for between March 1, 2020 and Dec 30, 2020.

**Question 209:** Can the City Manager certify the grant?

The CRF instructions for populations under 500,000 state the county judge or mayor of the jurisdiction must review, agree to the terms and conditions and sign the certification form. However, the certification form, Exhibit B includes City Manager as well as county judge or mayor to sign the form.

**Answer**
The person certifying the grant has to be the person with the authority to enter into legally binding contacts on behalf of the city. Typically, that would be the Mayor or County Judge. However, if the City Manager holds that authority, then the City Manager can certify.

**Question 210:** The TDEM website indicates that the Mayor or County Judge must sign off on the forms but then the forms indicate City Manager as well.

Is it okay for the City Manager to sign off on these forms?

**Answer**
The person certifying the grant has to be the person with the authority to enter into legally binding contacts on behalf of the city. Typically, that would be the Mayor or County Judge. However, if the City Manager holds that authority, then the City Manager can certify.
Question 211: If a local jurisdiction elects to take the 20% disbursement, does 75% of that amount have to be spent on those categories even though it is only 20% of the total allotment?

Answer
The requirement to spend 75 percent on the first three Coronavirus Relief Fund (CRF) categories applies to any part of the allocation that is spent. If an applicant was only to spend $10,000 of their CRF allocation, 75 percent of the $10,000 should be spent on the first three categories.

Question 212: Given that 75% of the grant funds are to be used for health related purposes leaving 25% for assisting small businesses, is that 25 % of the allotment or 25% of the grant request? If an applicant does not reach the 75% level of expenses for health-related purposes can the applicant exceed the 25% for small businesses?

Answer
The requirement to spend 75 percent on the first three Coronavirus Relief Fund (CRF) categories applies to any part of the allocation that is spent. If an applicant was only to spend $10,000 of their CRF allocation, 75 percent of the $10,000 should be spent on the first three categories.

Question 213: The Certification Section has the statement:

The undersigned grantee,_____________________ certifies, to the best of his or her knowledge that:

The county or city is actually the grantee and the Judge, Mayor, or City Manager has signatory authority. What should be written in this blank?

Answer
You are correct. Please put the printed name of the person signing the document in that blank.

Question 214: Are percentages based on total allocation? There’s been confusion on whether or not the threshold is based on total allocation or funds received.

Answer
The requirement to spend 75 percent on the first three Coronavirus Relief Fund (CRF) categories applies to any part of the allocation that is spent. If an applicant was only to spend $10,000 of their CRF allocation, 75 percent of the $10,000 should be spent on the first three categories.
**Question 215:** On the “Terms and Conditions” document. It has page 22 but then jumps to page 30.  
What pages are missing in between?

**Answer**
You are correct that the page numbers jump from 22 to 30. This is due to how the document was edited prior to publication. Nothing is missing from the document.

**Question 216:** How much of the funding allocation is allowed to be utilized towards the humanitarian or business impact needs.

**Answer**
Up to 25% of the funding spent can go toward:
- Expenses of actions to facilitate compliance with COVID-19-related public health measures, expenses associated with the provision of economic support in connection with the COVID-19 public health emergency, and any other COVID-19-related expenses reasonably necessary to the function of government that satisfy the Fund’s eligibility criteria.


**Question 217:** The grant agreement states that a minimum of 75% of the allotment will be spent in the categories of medical expenses, public health expenses and payroll expenses. What happens if an applicant accumulates only 50% in expense in those categories, will the funds that have been requested and reimbursed be required to be returned?

**Answer**
Yes, all funding not spent on eligible expenses with documentation must be returned to the state. The requirement to spend 75 percent on the first three Coronavirus Relief Fund (CRF) categories applies to any part of the allocation that is spent. If an applicant was only to spend $10,000 of their CRF allocation, 75 percent of the $10,000 should be spent on the first three categories.

**Question 218:** If an applicant currently does not use E-Verify, can that applicant begin now to use E-Verify and qualify for the CRF funds?

**Answer**
Jurisdictions must certify compliance with all terms and conditions of the CRF grant, including the use of the verify system.
**Question 219:** Will cities within counties under 500,000 population receive funding directly, or will the funds go to the county government first and the county would then in turn make the funds available to the City?

**Answer**
The city will receive their own allocation and be responsible for the terms and conditions.

**Question 220:** The May 11, 2020 letter says cities and counties should work together. How is the $55 per capita allocation for both the City and the County? Is it $55 for each, or is there an allocation between the City and the County?

**Answer**
Each county and each incorporated jurisdiction will receive a separate allocation which is based on $55 per capita. A county’s allocation is based on the unincorporated population of the county. Each of these jurisdictions will need to download the terms and conditions and submit the forms. In addition, each jurisdiction will be responsible for the funds and providing documentation to support that these funds are spent as required.

**Question 221:** Some counties are not included in the 20% allocation list on the website. 8 of the 27 counties who have no COVID cases at this time are not listed. What is the rationale utilized to comprise the list?

**Answer**
Thank you for bringing this to our attention. All counties, at a minimum (unincorporated areas are not listed and are a part of the county’s numbers), should be listed on the site. TDEM isn’t sure what happened, but the spreadsheet has been updated to include these counties and TDEM is pushing this through QA/QC again.

**Question 222:** If one application (county and cities within it) is to be submitted through FEMA’s Public Assistance Program (75% match for Category B), does this funding need to be handled the same way, or can each city and the county submit a certification separately?

**Answer**
For the Coronavirus Relief Fund (CRF), each county and each incorporated jurisdiction within the county must submit separate terms and conditions document. They will not be connected and each entity will be responsible for their own funding allocations.
Question 223: Would a County jurisdiction be held responsible for any misallocation of funds by a City jurisdiction under the CRF process? Does the requirement for each jurisdiction to apply separately from the other to receive their funds alleviate any liability on the part of the County for any City misappropriations, either intentional or otherwise?

Answer
A county would not be held responsible for a jurisdiction’s funds (and their management or mismanagement) if separate allocations and separate terms and conditions are signed. However, if a jurisdiction is provided funds by a county, the county would ultimately be responsible for those funds. A municipality with their own allocation who signs a separate terms and conditions document is responsible for their own management of the funds and the county would not be responsible.

Question 224: Upon submitting an intent to participate, is 20% of the City’s allocation paid or is 100% of the City’s allocation paid?

Answer
20% of the allocation amount will be sent by electronic funds transfer after receipt of the completed and signed terms and conditions documents and the direct deposit authorization form. However, you will need to provide cost documentation for the first 20% payment as well as documentation for any costs above and beyond that initial 20% prior to requesting additional funds from your allocation.

Question 225: Are matching funds required?

Answer
No. The Coronavirus Relief Fund does not require matching funds or an applicant cost share.

Question 226: For the minimum 75% category requirement: If we receive an allocation for $100,000, do we have to first spend $75,000 on the first three categories (medical, public health, and payroll expenses) before being able to spend the remaining $25,000 on the last three categories or can we spend $25,000 on the first three and $25,000 on the last three categories and NOT spend the remaining $50,000?

Answer
The requirement to spend 75 percent on the first three Coronavirus Relief Fund (CRF) categories applies to any part of the allocation that is spent. If an applicant was only to spend $50,000 of their CRF allocation, 75 percent of the $50,000 should be spent on the first three categories.
**Question 227:** Can a city and an economic development corporation in a community both apply for funds for different projects under the Coronavirus relief fund?

**Answer**

Only the city government will have access to the funding via the Texas Grants Management System (GMS). It will be up to the city government how to utilize/distribute that funding within their jurisdiction. However, the city may transfer funds to another unit of local government within their jurisdiction, provided that the transfer qualifies as a necessary expenditure incurred due to the public health emergency and meets the other criteria of section 601(d) of the Social Security Act outlined in the Guidance.

**Question 228:** If a hospital is a county taxing district on its own, does the city put them under our expenses or should it go to the county? That is, can both city and county CRF be used to support hospital expenses related to COVID that have not been covered by other COVID funding streams?

**Answer**

Each county or city government who receives CRF funding is responsible for determining how those funds are spent within the requirements specified by the State and Federal governments. Whether a city or a county chose to utilize their funding toward a public hospital located within their jurisdiction would be up to that local government. Neither the city nor the county is required to provide funding for eligible expenses incurred by a public hospital but either may at their discretion.

**Question 229:** How are funds requested – through the State?

**Answer**

The Coronavirus Relief Fund's funding is for use only by state, county and local governments.

The U.S. Treasury sent funding directly to city governments of cities with population over 500,000 which are Austin, Dallas, El Paso, Houston, Fort Worth, and San Antonio.

The U. S. Treasury also sent funding directly to county governments of counties with population over 500,000 which are Bexar County, Collin County, Dallas County, Denton County, El Paso County, Fort Bend County, Harris County, Hidalgo County, Montgomery County, Tarrant County, Travis County, and Williamson County.

City and town governments located in these counties should contact their county government directly to discuss the funding.

The remaining funding allocated to Texas counties, cities, and towns was sent to the Texas State government for distribution. Funding is distributed by the State of Texas government to those remaining county, city and town governments using an allocation based on their populations. Details can be found at the TDEM CRF website: [https://tdem.texas.gov/crf/](https://tdem.texas.gov/crf/)
**Question 230:** Is there a dollar limit on reimbursements?

**Answer**
The dollar limit on reimbursements would be total allocated to the local unit of government listed on the allocation sheet which can be found at: [https://tdem.texas.gov/crf/](https://tdem.texas.gov/crf/)

Look for the words "this document" near the center of the webpage to find the link to the current allocation sheet showing the funding for each of the local governments.

Also be aware of the requirement to spend 75% of funds on the following categories is a requirement for applicants requesting funds through TDEM:
1. Medical expenses
2. Public health expenses
3. 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.

**Question 231:** Is there a template resolution that could be utilized if a governmental entity wishes to turn over its allocation to another governmental entity? If not, is there additional guidance on how this should occur?

**Answer**
While there is no template available, the following guidance has been provided:
- For example, a county may transfer funds to a city, town, or school district within the county and a county or city may transfer funds to its State, provided that the transfer qualifies as a necessary expenditure incurred due to the public health emergency and meets the other criteria of section 601(d) of the Social Security Act outlined in the Guidance. For example, a transfer from a county to a constituent city would not be permissible if the funds were intended to be used simply to fill shortfalls in government revenue to cover expenditures that would not otherwise qualify as an eligible expenditure.

**Question 232:** Can individuals apply for funds from the Coronavirus Relief Fund?

**Answer**
For information regarding how/if Coronavirus Recovery Fund affects/applies to individuals in your location please ask your city government for further information. We also recommend you visit [https://www.disasterassistance.gov/](https://www.disasterassistance.gov/) for information on FEMA individual assistance for specific disasters.
Question 233: Are applicants required to spend 75% in categories 1, 2, and 3 before making purchases in the other categories? Does the 75%/25% split apply to the amount spent or the total amount allocated?

Answer
The requirement to spend 75% on the first three Coronavirus Relief Fund (CRF) categories applies to any part of the allocation that is spent. If an applicant was only to spend $10,000 of their CRF allocation, 75% of the $10,000 should be spent on the first three categories. Additionally, the 75% requirement does not mean that no purchases can be made for the other categories until the threshold has been hit.

Question 234: Is there a way for applicants to track spending?

Answer
Each applicant will be responsible for tracking expenditures through their own accounting system. Additionally, all costs will need to be documented in the Texas Grants Management System. TDEM staff and affiliates are currently focused on the prompt distribution of the initial 20% funding to eligible applicants. When TDEM begins distribution of the remaining funding, applicants will be briefed on the steps for uploading cost documentation into the Texas Grants Management System (GMS) as well as submitting a Request for Reimbursement in GMS.

Question 235: Will forms/spreadsheets be provided to assist us in tracking and submitting the expenses and documentation?

Answer
Each applicant will be responsible for tracking expenditures through their own accounting system. Additionally, all costs will need to be documented in the Texas Grants Management System. TDEM staff and affiliates are currently focused on the prompt distribution of the initial 20% funding to eligible applicants. When TDEM begins distribution of the remaining funding, applicants will be briefed on the steps for uploading cost documentation into the Texas Grants Management System (GMS) as well as submitting a Request for Reimbursement in GMS.

Question 236: How do school districts access CRF funding? Can a County transfer CRF funds to a school district?

Answer
Yes. A county may, for example, transfer funds to a city, town, or school district within the county and a county or city may transfer funds to its State, provided that the transfer qualifies as a necessary expenditure incurred due to the public health emergency and meets the other CRF eligibility criteria.
Question 237: If a County passes on CRF funding to a school district, would that cause the County to be a pass-thru for dollars going to other entities in the county?

Answer
A pass-through entity relationship, as defined by federal regulations, would only be created if the county formally provided a subaward of funding. A pass-through entity relationship would not be created if a county reimbursed a school district's eligible costs and then reimbursed itself with CRF funds. In either case, however, the County would have a responsibility to ensure all funds are expended in compliance with the grant terms and conditions.

Cities Located in Multiple Counties

Question 238: If a city is located within two counties, can the city utilize CRF funding from one county for expenses in the other county?

Answer
Yes, there is no mandate or guideline that disallows this.

Question 239: If a city is located within two counties, can the city utilize CRF funding from one county to perform testing at a nursing home facility in the other county?

Answer
Yes.

Question 240: In the past, cities located within two counties were required by FEMA to complete project worksheets through the county the damage was in, but were eventually allowed to submit projects through whichever county was more efficient. Does the same requirement apply for CRF funds?

Answer
While being managed similarly to FEMA funding, the CRF operates under different law and guidance. There is no law, rule or policy relating to this same factor with the CRF funds.
**Question 241**: If a City is located within more than one county and one of those counties is a jurisdiction that received funds directly from the U.S. Treasury but another is not, what is the appropriate route to seek Coronavirus relief funds?

**Answer**
After submitting the signed terms and conditions, the city will receive the allocations based on the population in the count(y/ies) which did not receive funding directly from the U.S. Treasury. Regarding the count(y/ies) that did receive funding directly from the U.S. Treasury, you are encouraged to discuss funding with that county directly.

**Question 242**: If a city spans two different counties, would the city be responsible for requesting all city funds regardless of which county it is located in?

**Answer**
Yes, the city is responsible for both funding allocations. When TDEM receives the paperwork the applicant only needs to fill it out once and submit. TDEM is trying to combine payments in these cases, but it is possible it will arrive via electronic funds transfer in two payments.

**Question 243**: If a city is located within two counties, can the city utilize CRF funding from one county to purchase PPE for distribution to local businesses in the other county?

**Answer**

“Expenses for acquisition and distribution of medical and protective supplies, including sanitizing products and personal protective equipment, for medical personnel, police officers, social workers, child protection services, and child welfare officers, direct service providers for older adults and individuals with disabilities in community settings, and other public health or safety workers in connection with the COVID-19 public health emergency.”
Treasury Guidance and Treasury FAQs

**Question 244:** Regarding the FAQs – p. 5 – Which category of expense from the Terms & Conditions would the small business support fall under? I am thinking perhaps #5 – expenses associated with the provision of economic support in connection with the COVID-19 health emergency.

**Answer**
Correct, #5 is the only place these types of expenses would fall.

**Question 245:** Regarding CRF Guidance – p. 2 – If a city has an EMS department that could provide emergency medical response and transportation to COVID patients but that department’s operations are budgeted in the most recently approved budget and at this point, there is no change in the schedule or operation of this department due to COVID-19 – would any of the EMS expenses qualify as medical expenses?

**Answer**
These expenses would not qualify.

**Question 246:** Regarding CRF Guidance – p. 2 – Does this category only include supplies related to public safety employees? If a city installed sneeze guards, bought extra sanitizer, masks, and gloves for personnel who are not medical personnel, police officers, social workers, CPS officers, service providers for older adults or individuals with disabilities, or other public health or safety employees, does this mean these expenses are not considered medical expenses?

**Answer**
This would be allowed under the Treasury’s guidance of “Expenses of actions to facilitate compliance with COVID-19-related public health measures.”

**Question 247:** Regarding CRF Guidance – p. 2 – What are “expenses for technical assistance to local authorities” listed in the medical expense category? Could this be legal assistance related to COVID-19 orders? Could this be IT equipment or assistance to setup remote meeting capability for public meetings such as City Council meetings? Or maybe that would fall under “expenses for public safety measures”?

**Answer**
I believe both would be covered, but TDEM is confirming this.
Question 248: On the TDEM CARES Act website under Coronavirus Relief Fund (CRF) FAQs, the following question and response was noted:

May a unit of local government receiving a Fund payment transfer funds to another unit of government?
Yes. For example, a county may transfer funds to a city, town, or school district within the county and a county or city may transfer funds to its State, provided that the transfer qualifies as a necessary expenditure incurred due to the public health emergency and meets the other criteria of section 601(d) of the Social Security Act outlined in the Guidance. For example, a transfer from a county to a constituent city would not be permissible if the funds were intended to be used simply to fill shortfalls in government revenue to cover expenditures that would not otherwise qualify as an eligible expenditure.

Given school districts are political subdivisions, does the same answer apply to Councils of Governments (COGs), also political subdivisions? If yes, could any county served by the COG transfer funds to cover necessary expenditures due to the public health emergency (assuming all other criteria as noted above are met)?

Answer
It is possible that a county can use CRF funds for school districts and COGs if they so desired and the money is used within the parameters outlined in the terms and conditions. I would caution any jurisdiction to focus on eligible costs and the requirement to spend 75% of funds on the first three categories:

1. Medical expenses
2. Public health expenses
3. 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,

Question 249: Where can applicants find information and resources?

Answer
Information and resources are available at the following websites:
https://tdem.texas.gov/crf/
https://home.treasury.gov/policy-issues/cares/state-and-local-governments
Coordination with Other Sources of Funding

**Question 250:** What is the difference between this grant and the grant that the Governor asked entities to apply for through his office on April 15th: [https://gov.texas.gov/news/post/governor-abbott-announces-38-million-in-federal-covid-19-emergency-funding-for-local-governments](https://gov.texas.gov/news/post/governor-abbott-announces-38-million-in-federal-covid-19-emergency-funding-for-local-governments)

**Answer**
This is not the same funding source. The funding in the link is through the U.S. Department of Justice, Bureau of Justice Assistance and is different.

**Question 251:** Is reimbursement for “similar” costs under CRF and FEMA’s Emergency Protective Measures (Category B) allowable under both funding sources? Or do cities need to be bound to one or the other?

**Answer**
There are eligible costs that are the same under both CRF and FEMA Public Assistance (PA). You can determine which fund is best for your jurisdiction. However, you cannot have a duplication of benefits – using both funds for the same cost.

**Question 252:** If an applicant were to utilize these funds on a particular item, would that applicant not be eligible to submit for FEMA reimbursement also, once the incident period ends?

**Answer**
You would not be able to pay for an item with CRF and then claim that through FEMA. That is what is referred to as “duplication of benefits” and is not allowable with any federal funding stream.

**Question 253:** Please provide a quick explanation of the differences and similarities of the funding from CARES and the FEMA grant for COVID-19 funds.

**Answer**
While there are many expenses that are eligible under both FEMA and the CRF, they are completely different programs. TDEM Regional Unit Chiefs can provide a fact sheet on eligible expenses under the FEMA Public Assistance (PA) program. A noticeable difference between the two funds is the cost share. FEMA funds have a 75% (federal)/25% (local) cost share. CRF funds do not have a cost share. There are also some differences in allowable costs with CRF funds able to cover some types of expenses that FEMA does not (e.g. making grants available for small businesses).
Coronavirus Relief Fund (CRF)

**Question 254**: Who at the state can assist applicants with determining the most efficient and effective manner of utilizing the various Federal funding streams while preventing duplication of benefits?

**Answer**
As long as the funding is spent within the guidelines of the law, the U.S. Treasury guidelines and the terms and conditions, you should be good. If you have any questions, please don’t hesitate to reach out to this email crf@tdem.texas.gov or your local TDEM Regional Unit Chiefs.

**Question 255**: Is the funding intended to reimburse 100%? Or is there a “cost share” – if so, what is the split?

**Answer**
The Coronavirus Relief Fund does not require matching funds or an applicant cost share.

**Question 256**: If an entity receives an email regarding the FEMA Public Assistance program, how should the entity proceed?

**Answer**
The specific email referenced in the original question was from the Support Affiliate associated with the FEMA Public Assistance grant program for COVID-19 expenses. Please direct any questions you may have for that program to the individual who emailed you. Funding provided through the Coronavirus Relief Fund is a separate program from FEMA Public Assistance.

**Question 257**: Can the 25% matching requirement for the FEMA Public Assistance Program be met by using the CARES Act Coronavirus Relief Funds for local governments?

**Answer**
We are awaiting guidance from FEMA and Treasury regarding how Coronavirus Relief Funds may be used for FEMA Public Assistance non-federal share.

**Question 258**: For expenses not reimbursable under CRF, is there information on other grants under which they may be reimbursable?

**Answer**
We recommend you visit https://www.fema.gov/coronavirus and https://www.coronavirus.gov for information on additional grant programs and opportunities for assistance.