

APPROACH TO MAXIMIZING THE GRANT REVENUE

MULTIPLE GRANT AND REIMBURSEMENT PROGRAMS



Governments should develop a plan that will identify and monitor costs that are incurred due to COVID-19 activities.



Challenging times call for practical solutions

The impact of the COVID-19 virus on our local governments is virtually unprecedented in modern times. All parts of government, from the first responders to the public health workers, from the transit workers to the maintenance workers, are working together to ensure that the “curve is flattened.” And the federal government has established several programs designed to help local governments defray these extraordinary costs.

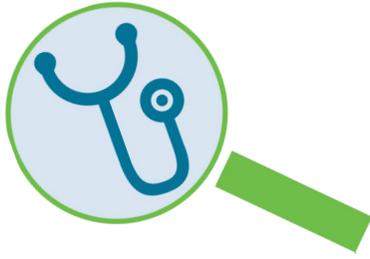
FEMA has expanded the types of allowable costs that it normally approves in cases of natural disaster. A partial list of allowable costs permitted under the FEMA Public Assistance program for the COVID-19 public health disaster can be found [here](#).

While the FEMA Public Assistance grants are one visible example of such a program, it is not the sole program. In fact, FEMA plainly states that it expects that entities utilizing the Public Assistance grants will utilize other grant opportunities first. Many of your existing grant programs have likely been expanded to allow for COVID-19

remediation activity costs. In many of these grant programs, you are likely incurring additional payroll costs that will be reimbursable. Further, there are likely non-payroll costs such as the following that will likely also be reimbursable:

- Extraordinary sanitation costs associated with government buildings and vehicles
- Additional networking hardware and software purchased to permit for the orderly transition of your workforce to remote work locations
- Training your employees on how to operate in such a telework environment
- Additional transportation, fuel and insurance costs incurred for first responders
- Potentially, even overtime meals for employees who are required to be on duty due to the declared emergency

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of service*



HOW UHY CAN HELP

After assessing your efforts to identify and document the costs incurred to date, we will develop a plan that will continue to identify and monitor those costs that are incurred related to COVID-19 activities. We will develop templates for documenting all personnel costs incurred related to these activities as well as the non-personnel costs related to incurring these costs. A few key features of those templates will be the following:

- It will facilitate the preparation of a prepared by client (PBC) list that will document all departments and personnel responsible for providing the COVID-19 costs incurred.
- All costs should be labeled with either COVID-19 or coronavirus in one of the data fields to allow for easy searching.
- For non-payroll costs incurred using an emergency or a sole source procurement method, notation of the rationale for using a non-competitive procurement method will be attached to the supporting documentation.

We believe that all supporting documentation for COVID-19 activities should be centrally maintained. We intend to use the software program Suralink to facilitate data maintenance. Suralink operates using a secure file transfer protocol so all documents are uploaded safely. Only invited users will be able to upload and download documents. When we create the PBC list

previously discussed, Suralink will automatically track uploaded documents against the PBC list and report the status of all PBC items to both the government and UHY. By using Suralink and maintaining documentation centrally, we can monitor the documentation to ensure that it meets grant requirements regarding allowability, minimizing the risk of disallowance.

We believe it is important for you to obtain and maintain an up-to-date report on the costs you have incurred. Accordingly, we believe that these data calls be conducted weekly to update these costs incurred continually. This prevents having to go back in time many months from now to try to recreate the audit trail for such costs. These weekly reports will also be aligned, by grant program, to facilitate the drawing down of the eligible costs. This also allows us to track the timely drawdown for reimbursement of eligible costs incurred and the timely required grant reporting to the funding department. These weekly reports will be provided to your finance and budget managers so they are assured that the costs incurred and requested for reimbursement meet the compliance standards and are timely drawn down and reported to FEMA and other funding agencies. This process has the further benefit of assisting you in preparing for the future audits of these expenditures by your Uniform Grant Guidance Audit auditor and federal and state auditors who may also choose to do program audits.

One final aspect will be critical in maximizing federal reimbursement, and that is the monitoring of your subrecipients. The Office of Management and Budget has considerably relaxed certain grant management administrative requirements, especially those related to reporting and auditing. It is therefore critical that you ensure that your subrecipients to whom you are relying on to execute COVID-19 activities are following essentially the same documentation practices that you are following. We can work with you to identify any subrecipients that are performing such COVID-19 activities and develop a monitoring plan that will identify how those subrecipients are incurring allowable costs and are reporting such costs for reimbursement.

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APPROACH TO MAXIMIZING THE GRANT REVENUE

ALLOWABLE COSTS PERMITTED UNDER THE FEMA PUBLIC ASSISTANCE PROGRAM



EMERGENCY MEDICAL CARE

- Triage and medically necessary tests and diagnosis related to COVID-19 cases
- Emergency medical treatment of COVID-19 patients
- Prescription costs related to COVID-19 treatment
- Use or lease of specialized medical equipment necessary to respond to COVID-19 cases
- Purchase of PPE, durable medical equipment, and consumable medical supplies necessary to respond to COVID-19 cases (note that disposition requirements may apply)
- Triage and medically necessary tests and diagnosis related to COVID-19 cases
- Emergency medical treatment of COVID-19 patients
- Prescription costs related to COVID-19 treatment
- Use or lease of specialized medical equipment necessary to respond to COVID-19 cases
- Purchase of PPE, durable medical equipment, and consumable medical supplies necessary to respond to COVID-19 cases (note that disposition requirements may apply)
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 - Emergency medical treatment of COVID-19 patients
 - Prescription costs related to COVID-19 treatment
 - Use or lease of specialized medical equipment necessary to respond to COVID-19 cases
 - Purchase of PPE, durable medical equipment, and consumable medical supplies necessary to respond to COVID-19 cases (note that disposition requirements may apply)

EMERGENCY PROTECTIVE ACTIVITIES

Costs necessary to save lives or protect public health and safety.

- Triage and medically necessary tests and diagnosis related to COVID-19 cases”
 - Emergency medical treatment of COVID-19 patients
 - Prescription costs related to COVID-19 treatment
 - Use or lease of specialized medical equipment necessary to respond to COVID-19 cases
 - Purchase of PPE, durable medical equipment, and consumable medical supplies necessary to respond to COVID-19 cases (note that disposition requirements may apply)
- Non-deferrable medical treatment of infected persons in a shelter or temporary medical facility
- Related medical facility services and supplies
- Temporary medical facilities and/or enhanced medical/hospital capacity (for treatment when existing facilities are reasonably forecasted to become overloaded in the near term and cannot accommodate the patient load or to quarantine potentially infected persons)
- Use of specialized medical equipment
- Medical waste disposal
- Emergency medical transport
- Medical sheltering
- Household pet sheltering and containment actions related to household pets in accordance with CDC guideline
- Purchase and distribution of food, water, ice, medicine, and other consumable supplies, to include personal protective equipment and hazardous material suits movement of supplies and persons
- Security and law enforcement
- Communications of general health and safety information to the public
- Search and rescue to locate and recover members of the population requiring assistance
- Reimbursement for state, tribe, territory and/or local government force account overtime costs