

Answers from state officials to questions raised during federal funds webinar on March 4

1. Can you describe exactly what is meant by FEMA for "Feeding Programs" for local governments? Does that include Municipally sponsored Grab & Go Programs?
 - a. If FEMA is involved it's not related to school meals. Possibly related to emergency food box initiatives.
2. Town of West Newbury is part of a regional approach for administering vaccines approved by Gov. Baker. If a clinic is held in another Town besides ours and we incur costs, who submits for them, us or the other Town/City where the clinic was held?
 - a. In this scenario, I recommend that the Town submit directly to FEMA for all costs incurred by the Town, even if the clinic itself were held in another municipality.
3. Is there a place to see what funds and grants have made their way to my town to date and/or applied for?
 - a. Information pertaining to federal funding for specific municipalities can be found here:
<https://www.mass.gov/info-details/about-covid-19-federal-funds>
4. What is covered under the feeding programs
 - a. If FEMA is involved it's not related to school meals. Possibly related to emergency food box initiatives.
5. Please explain the reconciliation process - when and how we will be able to access CVRF funds that have yet to be claimed.
 - a. Further information pertaining to the ongoing Reconciliation Period can be found here:
<https://www.mass.gov/doc/cvrf-mp-supplemental-guidance/download>
6. Do "Feeding Programs" mean school meals & as students come back will meals distributed outside public schools but to charter and choice and pre-school students?
 - a. If FEMA is involved it's not related to school meals. Possibly related to emergency food box initiatives.
7. We applied to FEMA for reimbursement months ago and a smaller portion was approved. Still haven't seen a disbursement. I am concerned that we will have a large deficit at the end of the year. How long will FEMA make us wait for our approved funds?

- a. Please contact your MEMA project coordinator for an update regarding the status of your FEMA PA application
8. It would have been extremely helpful to all if Chapter 30B was relaxed. Is anyone working on that by any chance? Same for procurement using federal funds — some relief on the administrative burden would be a massive help to all.
 - a. The CARES Act does not have stipulations regarding procurement. Sub-recipients should follow the same procurement rules and regulations that they normally would.
9. Heath, is there a resource available that indicates the related CFDA and dollar amount of federal disbursements by municipality? Mass.gov/federalfunds appears to indicate the CvRF by municipality as a whole whereas SEFA reporting requires further detailed review.
 - a. Information pertaining to federal funding for specific municipalities can be found here:
<https://www.mass.gov/info-details/about-covid-19-federal-funds>
10. Do you have projections on when we will see the FEMA reimbursements?
 - a. Please contact your MEMA project coordinator for an update regarding the status of your FEMA PA application.
11. How much can school districts draw down and when? Can we have a negative balance in our grant account when we request a drawdown? What are the drawdown deadlines and the timetable (or where can we find that info)? Thank you!
 - a. See DESE's grant drawdown instructions posted here:
<https://www.doe.mass.edu/grants/edgrants/requesting-funds.docx>
12. With the reconciliation application round being extended to June 30, 2021, are we able to make multiple applications to cover costs being incurred or should we be essentially fronting the cash until applying on June 30?
 - a. You are able to submit multiple Reconciliation Period applications on a rolling basis between now and June 30.
13. Many Transit Stations/Transportation Locations Have businesses, in, or near, such locations. What assistance are they most intended to be able to access?
 - a. Various resources regarding small business assistance in the Commonwealth can be found here:

<https://www.empoweringsmallbusiness.org/covid-19-response/small-business-resources>

14. Relative to the 100% FEMA reimbursement now retro to 1/1/20: will the recouped CvRF funds go back to the original city and town allocations, or, back to the state for re-programming?
 - a. Recouped CvRF-MP funding will go back to the municipality for potential reallocation to other CvRF-MP eligible expenses.
15. Any guidance yet on end of year accounting procedures for the FEMA fund and CARES fund?
 - a. Relevant guidance from the Division of Local Services can be found here:
<https://www.mass.gov/info-details/covid-19-resources-and-guidance-for-municipal-officials#dls-services->
16. Is there a way for a Town Finance Committee to track what Federal Funds have been received and what expenses were paid with those funds?
 - a. Information pertaining to federal funding for specific municipalities can be found here:
<https://www.mass.gov/info-details/about-covid-19-federal-funds>
17. Where can we find more information on ESSR funding
 - a. <https://www.doe.mass.edu/federalgrants/esser/>
18. Are there any changes coming regarding eligible uses for CRF funding? Massachusetts is more restrictive than other states and the FEMA reimbursement changes make the CRF limits even more difficult to address.
 - a. There are no planned changes to the current CvRF-MP program eligibility
19. Please clarify the recon process for CARES money already received for the 25% assumed now covered by FEMA. With the new FEMA 100% context will municipalities need to do a full reach back into the past (even on closed Fiscal years) and reimburse that 25% already received and reconciled (assuming it's deemed 100% eligible)?
 - a. Municipalities should work with the Massachusetts Emergency Management Agency (MEMA) to apply to FEMA for reimbursement. With the revised FEMA PA program guidelines, expenses that were submitted and were denied will automatically be reconsidered; however, municipalities should plan to submit a new FEMA PA applications for all expenses

that have not yet been submitted to FEMA but fall within their updated program guidelines.

- b. The 25% CvRF-MP "match" funding for expenses that will now be covered at 100% by FEMA can be reattributed to other CvRF-MP eligible expenses.
20. For those small number of Towns in the "last mile" can we use any of the various emergency funds towards the buildout of our fiber optic network?... which is integral to remote learning, etc....
 - a. Certain broadband expansion expenses may be eligible uses of CvRF. Firstly, the expense must: (1) be necessary as a result of the public health emergency caused by COVID-19; (2) be incurred between March 1, 2020 and December 31, 2021; and (3) have been unbudgeted as of March 27, 2020. Additionally, any broadband expansion must be either targeted towards public school students or municipal employees.
21. Please talk about the overlap between FEMA and ESSER in terms of school costs - How do we know which expenditures to apply to which grant?
 - a. The Massachusetts Emergency Management Agency (MEMA) can help you determine which expenses are eligible for FEMA PA reimbursement. All non-FEMA PA eligible expenses can then be funded through ESSER (assuming that the expense meets ESSER eligibility guidelines).
22. For those towns with regional school systems, if we want to provide some of our municipal funds for assisting our schools, does that continue to be through a "sub grantee " and must we approve the use for that in advance?
 - a. Yes, a sub-grantee agreement is the best approach for municipalities that wish to transfer CvRF-MP funding to a regional school district. Alternatively, the municipality can incur the expenses directly on behalf of the school district.
23. I am looking for guidance on additional hours for salaried employees well in excess of their normal hours and if there is any outlet to have these employees compensated through COVID funds. These additional hours are directly related to the pandemic.
 - a. The Coronavirus Relief Fund ("CRF") is designed to provide ready funding to address unforeseen financial needs and risks created by the COVID-19 public health emergency. Treasury's Guidance provides examples of a broad class of employees whose payroll and benefit 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.

- b. These employees' payroll and benefits may be covered using payments from the Fund to the extent incurred between March 1 and December 31, 2021. If an employee is not substantially dedicated to mitigating or responding to the COVID-19 public health emergency, his or her payroll and benefits expenses may not be covered in full with payments from the Fund. A portion of such expenses may be able to be covered with proper documentation.
- c. 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.
- d. Treasury has not developed a precise definition of what "substantially dedicated" means given that there is not a precise way to define this term across different employment types. Municipalities should maintain documentation of the "substantially dedicated" conclusion with respect to its employees.
- e. As an administrative accommodation, Treasury determined that State, local, or tribal governments may presume that public health and public safety employees meet the "substantially dedicated" test. As a result, all costs of such employees may be covered using payments from the Fund for services provided during the period that begins on March 1, 2020, and ends on December 31, 2021.
- f. Treasury allows CRF funds to be used to cover costs that were accounted for in the budget most recently approved as of March 27, 2020 but have been redeployed or repurposed for COVID-19 related purposes and are a substantially different use from the expected use of funds. 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. When making this determination, the municipalities should maintain documentation of the substantially different use conclusion to prove that the diversions are due entirely to COVID-19 and not some other cause.

24. Is DOR going to exempt deficits in FEMA and CARES from hitting our FY22 Free Cash?
 - a. Yes. The Division of Local Services can provide additional clarity on this matter as necessary.
25. My understanding is that the costs to bring in additional help to reconcile the various expenses and claims is also an eligible expense. Is that accurate?
 - a. Yes, so long as these additional costs are tied solely to compliance and reporting needs of CvRF and/or FEMA PA.
26. When will additional funds be available for expenses starting January 1, 2021?
 - a. Such funds (within a community's remaining CvRF-MP award balance) are available through the ongoing Reconciliation Period. Further information can be found here:
<https://www.mass.gov/doc/cvrf-mp-supplemental-guidance/download>
27. The reconciliation process - when and how we will be able to access CVRF funds that have yet to be claimed. HOW do we claim a 3rd payment???
 - a. Further information pertaining to the ongoing Reconciliation Period can be found here:
<https://www.mass.gov/doc/cvrf-mp-supplemental-guidance/download>
28. Any expectation of federal dollars to offer summer meals for kids again this year?
 - a. School meals resources can be found here:
<https://www.doe.mass.edu/covid19/school-meals.html>
29. Timeline for CARES reimbursements?
 - a. Although the Reconciliation Period is accepting applications on a rolling basis (meaning that municipalities can submit multiple applications in advance of the June 30th deadline), for the time being, we are requesting that municipalities hold off until later this month before doing so.
 - b. This is because we are still waiting for updated FEMA PA program guidelines regarding reimbursement rate and

eligibility from the federal government, who have indicated their plan to expand to pool of eligible expenses for FEMA PA reimbursement at a revised rate of 100%. Once we have these updated guidelines from FEMA, we will circulate a detailed analysis of the updates and a revised Reconciliation Period application; ideally, that will take place later this month. After that point, the turnaround time for applications should only be a couple of weeks

30. I am hearing that the ESSER II credits to towns isn't a done deal yet?
 - a. This is not the case. Information pertaining to your municipality's ESSER II allocation can be found here: <https://www.doe.mass.edu/federalgrants/esser/>
31. If IEPs are updated for "slide" and compensatory svcs and we add summer programs specifically for that, can we use grant funds to pay tuition and /or summer camps?
 - a. Yes, ESSER funds can be used for this purpose, though districts should be mindful of IDEA Maintenance of Effort (MOE) requirements when using ESSER funds to support special education programs.
32. I thought ESSER I ended 9/30/2021 but I thought Bill just said all ESSER funds go through 22 and 23. Did ESSER I get extended again?
 - a. ESSER I funding can be utilized until September 30, 2022.
33. Re FEMA: Do school districts get direct reimbursement or does it go to the community? If the community, regions must get direct reimbursements?
 - a. This depends on who the applicant for the reimbursement was. Please coordinate with municipal officials from your community if they are the ones handling the FEMA PA application process.
34. Guidance on Broadband expansion are important. Our community is struggling with bandwidth.
 - a. Certain broadband expansion expenses may be eligible uses of CvRF. Firstly, the expense must: (1) be necessary as a result of the public health emergency caused by COVID-19; (2) be incurred between March 1, 2020 and December 31, 2021; and (3) have been unbudgeted as of March 27, 2020. Additionally, any broadband expansion must be either targeted towards public school students or municipal employees.