



State Financial Services Division
Steve Bullock, Governor
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COVID-19 Reimbursement Guidance for Local Governments

(Updated September 10, 2020, for submission period 3/1/2020 – 8/31/2020)

Introduction

The purpose of this document is to provide guidance for local government reimbursement through the Governor's Coronavirus Relief Fund (CRF) contained in the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") and assistance through the Federal Emergency Management (FEMA) Public Assistance (PA) grant program authorized under the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

CARES Act

The CARES Act provides that payments from the CRF 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 local government; and
3. were incurred during the period that begins on March 1, 2020 and ends on December 30, 2020.

In addition to the statutory guidance above, there have been instances of supplemental guidance issued by the U.S. Department of Treasury (the "Treasury"). Specific examples of pertinent guidance currently known – relating specifically to local government expenditures – are as follows:

1. Eligible expenses include COVID-19 related expenditures for specific items including, but not limited to:
 - medical expenses;
 - public health expenses;
 - all regular and overtime pay including benefits (no paid leave) for first responder, public safety (including dispatch and detention), and public health personnel (March 12 – August 31, 2020);
 - other employees, regular and overtime hours substantially dedicated to mitigating or responding to the COVID-19 public health emergency; substantially dedicated means the employee dedicated at least 2/3 of regular time per pay period to mitigating or responding to COVID-19; and,
 - expenses to facilitate compliance with COVID-19 related public health measures.
2. Coronavirus Relief Funds may not be used to:
 - fill shortfalls in government revenue or be used to replace lost revenue including the provision of assistance to meet tax obligations;
 - duplicate reimbursement of expenses already reimbursed by the federal government; or
 - pay workforce bonuses other than overtime.

Guidance from the Treasury has been and will continue to be clarified, refined, and amended. As such, the State of Montana reserves the right to revise guidance to local governments based on guidance from the Treasury.

FEMA PA Grant Program

FEMA may provide funding to eligible PA applicants for costs related to emergency protective measures conducted as a result of the COVID-19 pandemic. Emergency protective measures are activities conducted to address immediate threats to life, public health, and safety. In general, costs related to the continuity of government may be eligible under CARES Act reimbursement; whereas costs related to emergency operation centers (EOC) may be eligible for FEMA reimbursement. Specific costs may include:

- emergency operations center activities (EOC)
- training
- facility disinfection
- technical assistance on emergency management
- dissemination of information to the public to provide warnings and guidance
- pre-positioning or movement of supplies, equipment, or other resources
- purchase and distribution of food, water, or ice
- purchase and distribution of other commodities
- security, law enforcement, barricading and patrolling
- storage of human remains or mass mortuary services

For questions about the FEMA PA grant program, please contact Tim Thennis at tthennis@mt.gov or 406 417-9235.

Process for Reimbursement

In order to receive reimbursement for costs incurred due to COVID-19 related expenditures, the Department of Administration Local Government Services Bureau and the Governor's Office of Budget and Program Planning have developed the following information and process to be used to compile and submit reimbursement request from the CRF:

1. Review in its entirety the existing guidance from the U.S. Department of Treasury pertaining to the CARES Act located at <https://home.treasury.gov/policy-issues/cares/state-and-local-governments>. Continually refer to this website as guidance is often updated without notice. In addition to Treasury guidance, the State of Montana will consider its own policy decisions for determining eligible reimbursements.
2. Each city, town, or county may submit one request per deadline. Reimbursement requests must be submitted by the applicable deadlines identified below (Section 5).
3. To claim COVID-19 related costs for reimbursement, complete the LGE COVID-19 Reimbursement Form and the LGE Certification Form at covidrelief.mt.gov.
 - Navigate to or click on the link above (Chrome or Firefox browser recommended)
 - Scroll down and select "CLICK HERE TO APPLY" (a new page will appear)
 - Scroll down and select "Local Government Reimbursements"
 - If your entity requested reimbursement in the previous cycle, reimbursement for subsequent cycles can be completed under the same user account, using the Additional Reimbursement Request Form – Local Government Reimbursement (located in the user account)
4. An LGE Certification Form must be submitted with each LGE Reimbursement Form, and the certification date and date range for costs incurred must be the same. Per the LGE COVID-19 Reimbursement Form, entities must:
 - List actual costs incurred related to COVID-19;
 - Provide sufficient documentation to support incurred costs and evidence of payment, which may include:
 - i. itemized invoices, receipts, and vouchers with valid dates
 - ii. payroll reports/timesheets listing employee job title, hours worked, and salary information
 - To increase efficiency and ensure payments are processed in a timely manner, please consider the following:
 - i. indicate the corresponding line number from the form on your supporting documentation
 - ii. complete the summary tabs (or equivalent) in the reimbursement form for FEMA and CARES Act expenses
 - Estimate remaining future costs to be incurred through December 30, 2020; and
 - Provide the LGE Certification Form signed by a member of the governing body.
5. Requests for reimbursement must be submitted by June 12, July 24, September 25, early December, and mid-January.
6. If you have any questions, email LGSportalregistration@mt.gov.