I. Nebraska COVID-19 Local Government Response Assistance Program

Governor Pete Ricketts has unveiled how the State of Nebraska plans to use federal coronavirus funds to get Nebraska growing. Of the relief funds received by the State, $100 million has been allocated for reimbursements to local governments for direct expenses incurred in response to the COVID-19 emergency. The State of Nebraska has entered into a contract with Deloitte and Touche (Deloitte) to manage the process to request reimbursement and process payments. The effort to implement the process is nearing completion and this is an update to previous guidance.

Eligible Units of Local Government:
- Counties
- Cities, and Villages
- Utility Districts

Necessary Expenditures Include:
- Acquisition and Distribution of
  - Personal Protective Equipment;
  - Sanitizing Products;
  - Testing Equipment;
  - Ventilators;
  - Other necessary COVID-19 Medical Supplies and Equipment;
- Temporary Isolation or Quarantine Sites;
- Other related necessary expenditures;
- Medical Transportation;
- Expenses for Sanitizing Public Areas and other Public Facilities; and
- Temporary Emergency Staffing and over-time costs for staff that is substantially dedicated to the mitigation or response to the COVID-19 Public Health Emergency; and
- Payroll costs for public health and public safety employees for services dedicated to mitigating or responding to the COVID-19 public health emergency. No presumption permitted.
- Equipment used for the conduct of meetings by telephonic or electronic means.

Limitations and Requirements:

Any funds provided pursuant to this program cannot be used as a revenue replacement for lower than expected tax or other revenue collections.

Douglas County and local political subdivisions, excluding the City of Omaha, within Douglas County are ineligible to receive reimbursement pursuant to this program. Douglas County has received their own direct allocations of Coronavirus Relief Funds.
In accordance with earlier guidance County Governments were required to open the County Courthouse and County Offices for business on a non-appointment basis prior to June 15, 2020 in order to receive funds. Appointments are permitted for services that normally require an appointment or to provide better service times for customers, but appointments may not be the sole means to obtain services. Customers may be encouraged to wear face coverings, but may not be refused service for failure to do so. Counties may otherwise require adherence to minimum social distancing guidelines and follow procedures for disinfecting common areas as established in the Directed Health Measure for that county.

Individual county offices may be closed if any employee within that office has been exposed or tested positive.

County board chairs may control traffic flow by limiting public access to certain proscribed entry and exit points.

**Process for Requesting Reimbursement of Qualified Expenses**

The State continues to work with Deloitte to establish the process to be used to request reimbursement. A web-based process will be used to enter requests, upload supporting documentation and records, and will be unveiled over the next several weeks.

The County Board shall take formal action to qualify to submit a claim through the Nebraska COVID-19 Local Government Response Assistance Program. As part of the process, the County Board designee or the County Board Chair shall complete the Funding Request Certification Form in order to be eligible for a reimbursement claim.

The Mayor or Chief Executive for a city/village or local utility district must complete the Funding Request Certification Form in order to be eligible for a reimbursement claim.

**Initial claims shall be for costs incurred between March 1, 2020 and July 1, 2020. Those claims shall be submitted during the month of July in accordance with a date yet to be identified. The completion of the web-based portal will dictate the deadline date and information will be forthcoming.** Claims would then be submitted on a monthly basis, i.e. expenses incurred July 1 – July 31, 2020 would be submitted by September 1, 2020. Claims for reimbursement must include documentation of the incurred expense, e.g., invoices (see COVID-19 Documentation Guidance).

An initial review by the State will be conducted to determine if the reimbursement claim meets the “necessary expenditures” criteria. Deloitte would then work with the requestor to ensure adequate documentation is received and initiate the reimbursement process through the State of Nebraska Accounting Division.
I. FEMA Public Assistance Requests

All eligible Local Public Entities for Public Assistance are encouraged to request reimbursement for eligible costs through FEMA under the Category B – Emergency Protective measures. This will provide flexibility if Coronavirus Relief Funds are permitted to be used for local cost share. Eligible entities should submit a Request for Public Assistance (RPA) on FEMA’s Grant’s Portal if one has not been submitted previously for DR 4521.

President Trump has stated that Coronavirus Relief Funds provided to the States can be used as the 25% match for Public Assistance; however, nothing has been received officially in writing that authorizes this approach. The State is asking local entities to begin the RPA process to keep this a viable option in the event authorization is provided for Coronavirus Relief Funds to be used for the 25% local share. Applicant briefings are being scheduled to allow eligible applicants to submit project requests. The Nebraska Emergency Management Agency will notify entities regarding the dates and times for the virtual applicant briefing sessions.

**Eligible Units of Local Government** – those entities normally eligible for participating in the Public Assistance program.

FEMA guidance indicates the following items would qualify:
- Personal protective equipment
- Sanitizing products
- Necessary medical supplies and equipment
- Temporary emergency staffing and overtime costs for staff that is substantially dedicated to the mitigation or response to the Covid-19 Public Health Emergency

Once a RPA form has been submitted and approved by FEMA, local entities can submit a project worksheet, through the FEMA Grants Portal, for eligible costs associated with the COVID-19 Public Health Emergency along with documentation supporting the claimed costs.

FEMA will review the submitted request for assistance/costs and supporting documentation and determine if any additional information is needed and make eligibility determinations.

Once the project and costs are deemed to be eligible by FEMA, the project will be obligated/awarded by FEMA. Following obligation of the project and receipt of federal funds, NEMA will transfer funds for 75% of the total eligible costs. There is a 75% Federal / 25% local cost share associated with the FEMA Public Assistance Projects.