



# Nassau County CARES Plan

## **Expenditure Plan for Coronavirus Relief Funds**

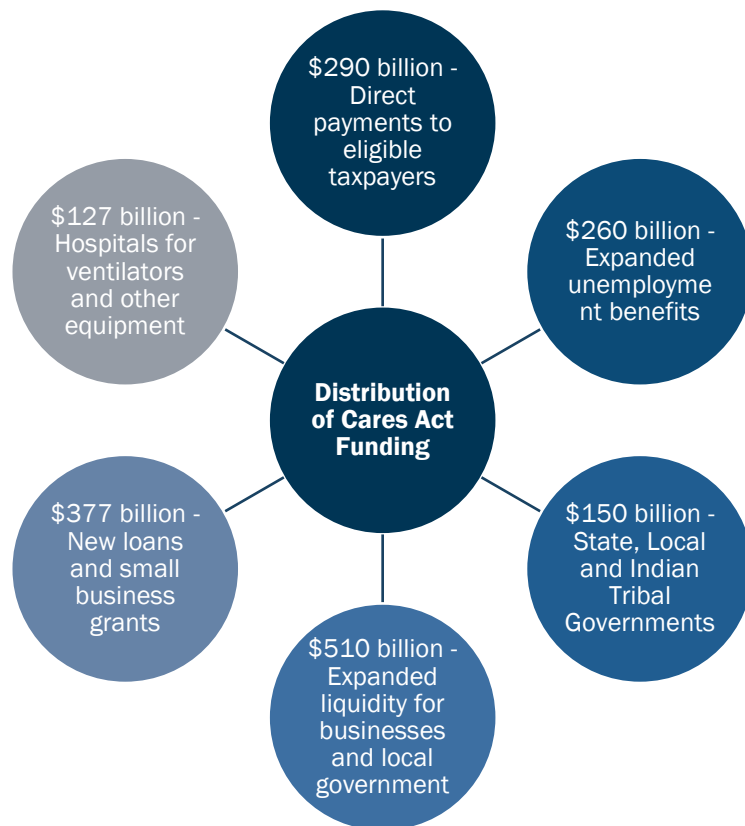
July 29, 2020

Table of Contents

Executive Summary .....	1
CARES Act Overview .....	2
Compliance Requirements .....	7
<i>Nassau CARES Plan</i> .....	8
BOCC Expenditure Authorization and Prioritization .....	15
Recommendation .....	16
Appendix .....	17

## Executive Summary

The Coronavirus Aid, Relief, and Economic Security (CARES) Act authorized more than \$2 trillion to counter the impact of COVID-19 and its effects on individuals, families, governments, and businesses. The CARES Act authorized the following:



As part of the \$150 billion distributed to State, Local, and Indian Tribal Governments, the State of Florida received \$8.328 billion and allocated the money as follows:

Description	Amount [Billions]
<b>State of Florida</b>	<b>\$4.581</b>
<b>12 Largest Florida Counties (populations more than 500,000 residents)</b>	<b>\$2.472</b>
<b>55 Florida Counties (populations less than 500,000 residents)</b>	<b>\$1.275</b>
<b>Total</b>	<b>\$8.328</b>

Nassau County is included as part of the \$1.275 billion allocated to Florida's 55 counties with populations less than 500,000 residents. The Nassau County Cares Financial Assistance Plan (Plan) identifies the Service Areas (Services) approved by the Board of County Commissioners (BOCC) in July 2020. The BOCC directed the County Manager's Office to develop a Plan that prioritized the delivery of Services to Nassau residents and business owners. On July 1, 2020, Nassau County received its 25% allocation, or \$3,866,095. The County is eligible to receive the remaining 75%, or \$11,598,285 on a reimbursement basis. Nassau County is eligible for CARES Act Funds totaling \$15,464,380.

This Plan outlines the Services, the funding by Service, and the representative assistance to be provided. The Plan is based on eligible expenditures as defined by the U.S. Treasury. The Plan takes into consideration the eligible period and the use of funds as defined by the U.S. Treasury.

## CARES Act Overview

On March 27, 2020 Congress passed the "Coronavirus Aid, Relief, and Economic Security Act" (the "CARES Act," H.R. 748) to provide direct economic assistance in response to the financial fallout related to the COVID-19 pandemic. This legislation provides \$2.2 trillion of economic relief and stimulus for businesses, individuals, federal agencies, and state and local governments, including a \$150 billion Coronavirus Relief Fund for state and local governments to help offset necessary expenditures incurred due to the COVID-19 public health emergency. As provided in the CARES Act, 12 Florida counties with a population greater than 500,000 received direct allocations from the U.S. Treasury totaling \$2.47 billion. Counties less than 500,000 in population, including Nassau County, were not eligible to receive a direct payment under the CARES Act. However, the bill allowed states to distribute funds to local governments under 500,000 in population, and on June 10, the Governor announced that the State of Florida will disburse the remaining funds allocated to Florida (totaling up to \$1.275 billion) to counties with a population below 500,000 through the Florida Division of Emergency Management (FDEM) for expenditures eligible for reimbursement.

Under Section 5001 of the CARES Act, eligible uses of Coronavirus Relief Funds may only be used to cover costs that:

- are necessary expenditures incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID-19),
- 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
- were incurred during the period that began on March 1, 2020, and ends on December 30, 2020.

The State of Florida was allocated \$8.3 billion in Coronavirus Relief Funds under the CARES Act. The Act required 45%, or \$3.7 billion, of these funds to be reserved for local governments, of this total. The 12 Florida counties with more than 500,000 in population were eligible for direct payments from the Treasury. These 12 counties received \$2.472 billion in direct funding leaving approximately

\$1.275 billion to be distributed to the remaining 55 Florida counties based on their proportion of the population for 55 counties. Based on the formula, Nassau County (County) is eligible to receive reimbursement up to \$15.5 million for qualified expenditures. Each county will receive an initial disbursement equal to 25% of the county's total allocation.

In June 2020, Governor Ron DeSantis announced the State of Florida's plan to disburse up to \$1.275 billion in CARES Act funds to counties with a population below 500,000. Using a phased approach, FDEM distributed funds to the remaining counties, including Nassau County, beginning with an initial disbursement of 25% of the County's allocation. On July 1, 2020, Nassau County received its 25% allocation, or \$3,866,095. The County is eligible to receive the remaining 75%, or \$11,598,285 on a reimbursement basis.

Nassau County executed its funding agreement with the State effective on June 17, 2020 and has received its initial disbursement totaling approximately \$3.9 million. Under the County's current funding agreement with FDEM, this initial allocation would allow the County to begin funding assistance programs included in the *Nassau CARES (Nassau CARES)* plan as may be approved by the Board, and the balance of the County's allocation would be provided by FDEM on a reimbursement basis. The County is working with FDEM to seek pre-approval of expenditures by the State for advance funding of the remaining 75% of the County's CARES Act allocation.

At the July 9, 2020 Board of County Commissioners (BOCC) meeting, the County Manager recommended, and the Board directed the County Manager to prepare a plan for the Board's consideration. The Plan allows the County to seek reimbursements for eligible expenditures outlined in the funding agreement with the Florida Division of Emergency Management (FDEM). Through the agreement with FDEM, Nassau County is eligible for CARES Act Funds totaling \$15,464,380. The *Nassau CARES* plan provides a broad range of recommended funding allocations for essential public health and safety expenditures related to COVID-19. *Nassau CARES* proposes the reimbursement of COVID-19-related costs incurred by the following entities within Nassau County.



In developing the funding recommendations proposed in the *Nassau CARES* plan, the County's CARES Act Team (Team) has conducted an extensive evaluation of the specific statutory and administrative requirements of the:

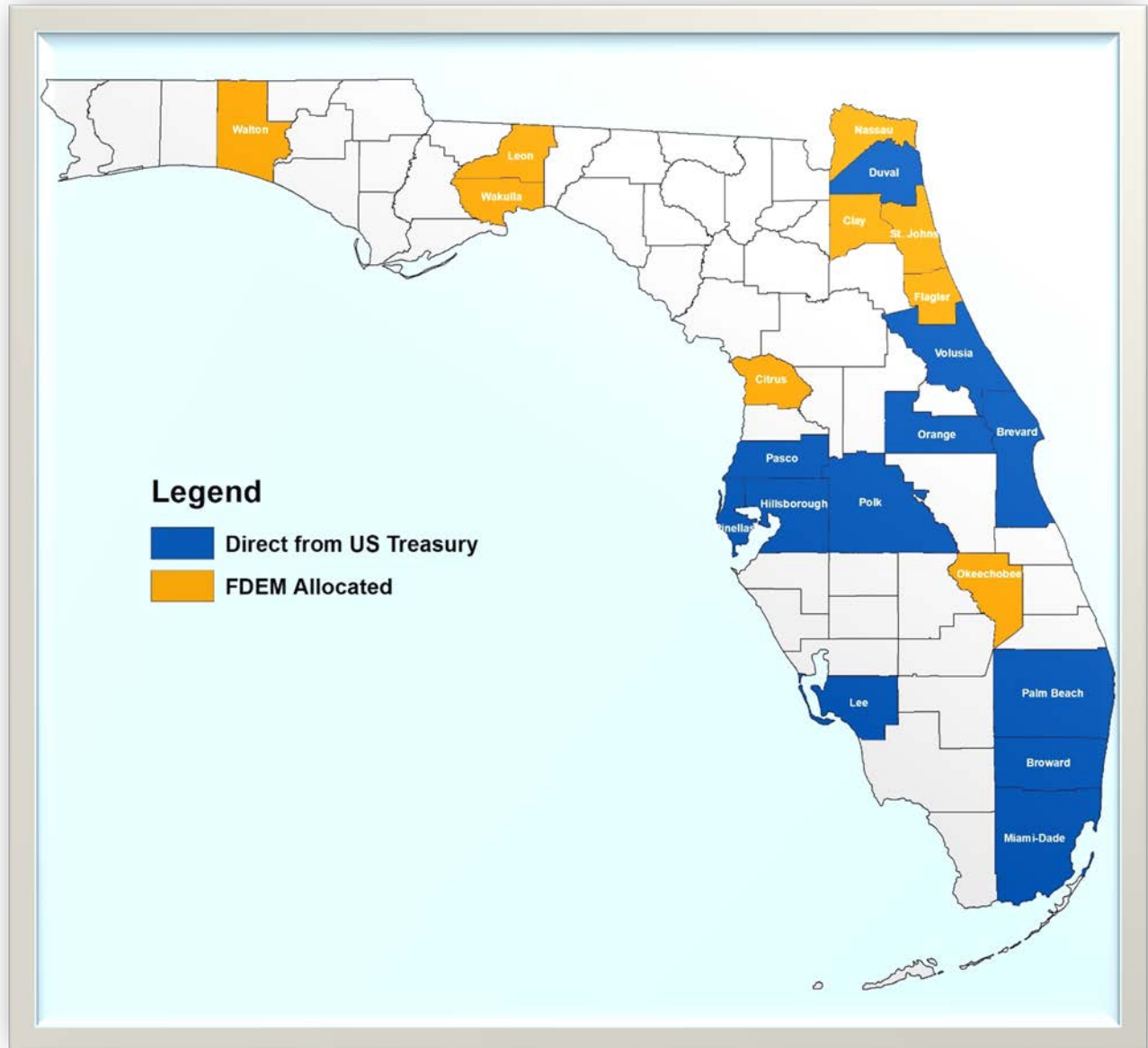


In addition to the evaluation noted above, the Team also reviewed the documentation provided by the oversight entities to determine the eligible uses of CARES Act funds based on the agreement with FDEM. The Team reviewed and maintains documentation from the following:

Organization	U.S. Treasury
	U.S. Homeland Security
	FDEM
	Florida Association of Counties
	County Policies and Procedures

To identify funding strategies that Florida counties have adopted as well as best practices to incorporate into the proposed *Nassau CARES* plan, the Team conducted a comprehensive review of CARES Act expenditure plans. The team reviewed the plans for the 12 Florida counties that received full allocation directly from the U.S. Treasury and a representative sample of the counties receiving their allocation from FDEM.

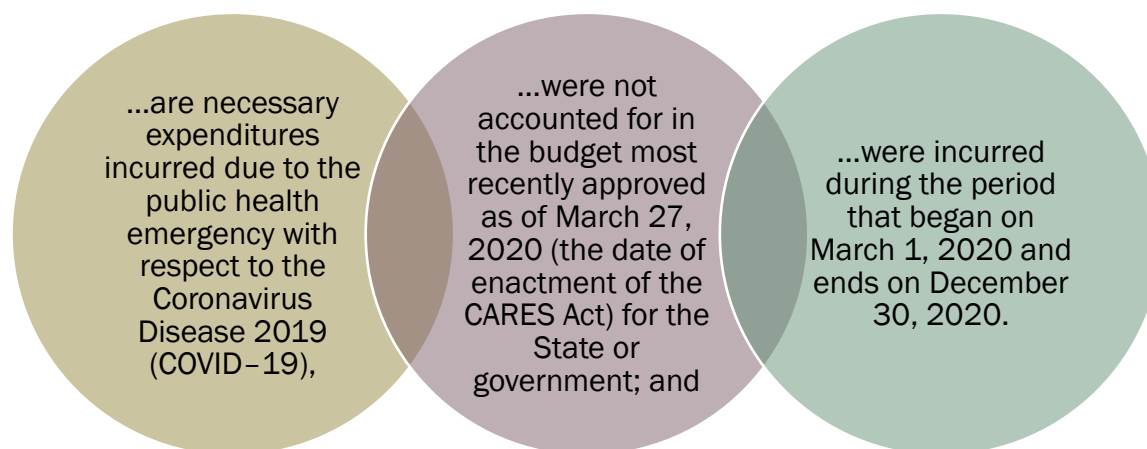
The Team reviewed the CARES Act plans for the counties illustrated in the map below:



The County coordinated with the local business community, healthcare and human services providers, and other local government stakeholders to identify a broad range of community needs resulting from the COVID-19 public health emergency. Many of these community partners are eligible to receive federal support under other sections of the CARES Act. In these instances, the *Nassau CARES* plan seeks to leverage the County's allocation to meet these community needs most effectively. Other community partners not funded through *Nassau CARES*, such as the colleges and

hospitals, have received or are eligible to receive an allocation of CARES Act funding that are subject to their own specific rules and guidance.

The CARES Act provides assistance to State, Local, and Tribal Governments through the establishment of the \$150 billion Coronavirus Relief Fund. Through the Coronavirus Relief Fund, the CARES Act provides for payments to State, Local, and Tribal governments navigating the impact of the COVID-19 outbreak. Under Section 5001 of the CARES Act, eligible uses of Coronavirus Relief Funds may only be used to cover costs that:



On July 1, 2020, Nassau County received its 25% allocation, or \$3,866,095. The County is eligible to receive the remaining 75%, or \$11,598,285 on a reimbursement basis. Nassau County is eligible for CARES Act Funds totaling \$15,464,380.

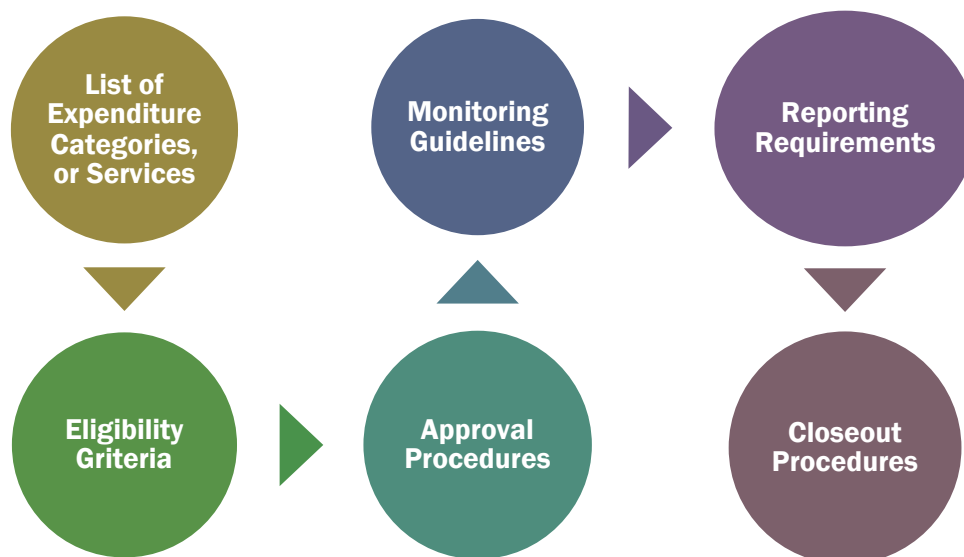
In response to the CARES Act funding, Nassau County's Board of County Commissioners (BOCC) directed the County Manager's Office to:

- Develop the Financial Assistance Plan,
- Review inclusion of requested expenditures for eligibility:
  - BOCC departments or services, Constitutional Offices or Elected Officials,
  - Municipal Governments,
  - Grants to Non-Profits, or
  - Other eligible costs.
- Develop the Expenditure Categories, Services and Eligibility Requirements,
- Manage the *Nassau CARES Plan*, and
- Monitor the Program and Report to BOCC, FDEM, and US Treasury, as required.



## Compliance Requirements

CARES Act requires compliance, including eligibility, allowability and Single Audit requirements for federal funds. These regulations include Section 601(d) of the Social Security Act, FS 215.422, 215.971 (1), 216.347, and CFO Memorandum 04. The County has a *Subrecipient Agreement* with the FDEM to ensure the CARES Act funds are disbursed, accounted, and reported in accordance with the applicable guidelines. Nassau County developed its plan to meet compliance with the CARES Act through the following elements:



In carrying out the priorities established by the BOCC, the County staff working with internal and external stakeholders used the guiding principles below in developing the *Nassau CARES* plan:

Eligible Expenditures	BOCC and County Responsibilities	Oversight
<ul style="list-style-type: none"> <li>• Necessary and incurred due to COVID-19 public health emergency</li> <li>• Not accounted for in budget most recently approved as of enactment date</li> <li>• Incurred during the period beginning 3/1/20 and ending 12/30/20</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure funds not used by 12/30/2020 must be returned to the Treasury</li> <li>• Confirm CARES Act Funding is <u>not</u> used to fill governmental revenue shortfalls</li> </ul>	<ul style="list-style-type: none"> <li>• County has to review and monitor eligible expenditures, including subrecipients</li> <li>• County will provide information or reporting to FDEM and the U.S. Treasury, Inspector General as required</li> </ul>

Nassau County is financially responsible for the CARES Act expenditures, approving service offerings, establishing eligibility criteria for applicants and subrecipients, approving release of funds and grants management, as well as quarterly reporting and subrecipient monitoring.

## *Nassau CARES Plan*

Based on the guidance, priorities, and directives from the BOCC, the County has outlined the services with the *Nassau CARES Plan*. The *Nassau CARES* framework and services are designed with flexibility that allows the County to respond to the needs of Nassau County Residents while complying with the CARES Act Requirements.

*Nassau CARES* provides for the efficient, targeted distribution of \$15.5 million in Coronavirus Relief Funds allocated under the Federal CARES Act (H.R. 748). *Nassau CARES* provides funding for essential public health and safety expenditures related to COVID-19 including a variety of human service needs, critical economic relief to the local business community, and direct COVID-related costs incurred by the County, Constitutional and Judicial Offices, and the municipalities within Nassau County. In developing its plan, the County requested input from the following entities:

Board of County Commissioners and Departments	Constitutional Offices and Elected Officials	Municipal Governments	Civic Leaders
<ul style="list-style-type: none"> <li>• County Commissioners</li> <li>• Department Directors</li> </ul>	<ul style="list-style-type: none"> <li>• Clerk of Courts</li> <li>• Sheriff's Office</li> <li>• School District</li> <li>• Property Appraiser's Office</li> <li>• Supervisor of Elections</li> <li>• Tax Collector</li> </ul>	<ul style="list-style-type: none"> <li>• City of Fernandina Beach</li> <li>• Town of Callahan</li> <li>• Town of Hilliard</li> </ul>	<ul style="list-style-type: none"> <li>• Chamber of Commerce</li> <li>• Small Business Development Council</li> <li>• Not for Profits</li> </ul>

As noted in the [CARES Act Overview](#) section of this plan, funding provided to recipients under the *Nassau CARES* program may only be used to cover eligible costs. The following table provides additional information for each expenditure category and a representative listing of services provided through the *Nassau CARES Plan*.

<b>Proposed Plan</b>		
<b>Category</b>		<b>Funding (% Total )</b>
<b>Economic Support and Recovery</b>	Safe at Work (\$986,293)	<b>\$3,406,293, 22%</b>
	Small Business Recovery Assistance (\$2,420,000)	
<b>Public Safety and Public Health Services</b>	COVID-19 Expenditure Recovery (\$1,817,610)	<b>\$8,372,369, 54%</b>
	Facilities-Operations Improvements (\$4,710,796)	
	Non-Congregant Sheltering (\$132,000)	
	Personal Protective Equipment (\$856,589)	
	Re-Emergence Preparedness (\$855,374)	
<b>Social Services &amp; Resident Needs</b>	Non-Profit Food Stability (\$1,010,398)	<b>\$1,147,898 8%</b>
	Non-Profit Support (\$88,000)	
	Social Service Agency Assistance (\$49,500)	
<b>Reserve for Unmet Needs</b>	Unmet Needs	<b>\$2,537,820 16%</b>
<b>Total</b>		<b>\$15,464,380</b>

The following pages provide additional information regarding the services and the proposed sub-allocations by jurisdiction.

## Expenditure Category 1: Economic Support and Recovery

Economic Support and Recovery is intended to help businesses affected by COVID-19. There are two services provided in this category. Provided below is an overview of the program. Additional eligibility and documentation requirements may be required.



### Small Business Assistance

- Funds can only be used for expenses not covered by other resources
- Business must have 9 or fewer full-time equivalent employees
- 2019 revenues of less than \$1.0 million
- The business owner must be a Nassau County resident
- Maximum award per business is \$5,000



### Safe at Work

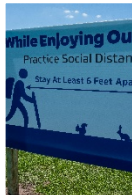
- Funds can be used for unanticipated and unfunded expenses incurred due to COVID-19
- Includes items such as personal protective equipment (PPE) for businesses, cleaning supplies, or technology enhancements for remote work access

The table below provides the estimated allocation by service and sub-allocation.

Economic Support and Recovery		\$3,406,293
<b>Safe at Work</b>		<b>\$986,293</b>
Sub-Allocation	Clerk of Courts	\$88,269
	Nassau County	\$825,000
	Nassau School District	\$26,422
	Property Appraiser's Office	\$33,402
	Tax Collector	\$13,200
<b>Small Business Recovery Assistance</b>		<b>\$2,420,000</b>
Sub-Allocation	Nassau County	\$2,420,000

**Expenditure Category 2: Public Safety and Public Health Services**

The planned and incurred eligible expenditures within this Service have countywide benefit. There are five services provided in this category. Provided below is an overview of the program. Additional eligibility and documentation requirements may be required.


**COVID-19 Expenditure Recovery**

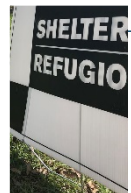
- Decontamination equipment, ventilation improvements, and increased public health prevention measures


**Facilities-Operations Improvements**

- Decontamination equipment for Public Safety Vehicles
- Updated Response Protocols


**Personal Protective Equipment**

- Purchases of PPE for county, constitutional, elected official or municipal personnel


**Non-Congregant Sheltering**

- Increased public health prevention measures for non-congregate sheltering


**Re-Emergence Preparedness**

- Preparedness for government buildings, facilities, or non-congregate sheltering

The table below provides the estimated allocation by service and sub-allocation.

<b>Public Safety and Public Health Services</b>		<b>\$8,372,369</b>
<b>COVID-19 Expenditure Recovery</b>		<b>\$1,817,610</b>
Sub-Allocation	City of Fernandina Beach	\$329,568
	Nassau County	\$1,101,680
	Nassau County Sheriff's Office	\$334,816
	Tax Collector	\$51,546
<b>Facilities-Operations Improvements</b>		<b>\$4,710,796</b>
Sub-Allocation	City of Fernandina Beach	\$119,270
	Nassau County	\$3,149,096
	Nassau County Sheriff's Office	\$171,600
	Nassau School District	\$1,089,000
	Supervisor of Elections	\$82,500
	Town of Hilliard	\$99,330

<b>Public Safety and Public Health Services</b>		<b>\$8,372,369</b>
<b>Non-Congregant Sheltering</b>		<b>\$132,000</b>
Sub-Allocation	Nassau County	\$132,000
<b>Personal Protective Equipment</b>		<b>\$856,589</b>
Sub-Allocation	City of Fernandina Beach	\$5,500
	Clerk of Courts	\$12,491
	Nassau County	\$389,675
	Nassau County Sheriff's Office	\$258,033
	Nassau School District	\$186,375
	Property Appraiser's Office	\$423
	Tax Collector	\$792
	Town of Hilliard	\$3,300
<b>Re-Emergence Preparedness</b>		<b>\$855,374</b>
	Nassau County	\$855,374

**Expenditure Category 3: Social Services and Resident Needs**

Social Services and Resident Needs is intended to help residents affected by COVID-19. There are three services provided in this category. Provided below is an overview of the program. Additional eligibility and documentation requirements may be required.


**Non-Profit Food Stability**

**Non-Profit Support**

**Social Service Agency Assistance**

The table below provides the estimated allocation by service and sub-allocation.

<b>Social Services and Resident Needs</b>		<b>\$3,406,293</b>
<b>Non-Profit Food Stability</b>		<b>\$1,010,398</b>
Sub-Allocation	City of Fernandina Beach	\$207,900
	Nassau County	\$802,498
<b>Non-Profit Support</b>		<b>\$88,000</b>
Sub-Allocation	City of Fernandina Beach	\$33,000
	Nassau County	\$55,000
<b>Social Service Agency Assistance</b>		<b>\$49,500</b>
Sub-Allocation	City of Fernandina Beach	\$49,500

**Expenditure Category 4: Reserve for Unmet Needs**

Like many Florida counties, Nassau County has established a reserve or replenishment category (Unmet Needs). In the event of future unexpected needs, such as testing, contract tracing, food stabilization, or non-congregate sheltering, or for potential Congressional changes to the authorized uses of these funds, the County is able to make adjustments as needed to optimize the County's use of the CARES Act funds.

Reserve for Unmet Needs		\$2,537,820
Sub-Allocation	Nassau County	\$2,537,820



## BOCC Expenditure Authorization and Prioritization

Provided as an appendix is the *Nassau CARES* Team's recommended prioritization of the Plan's expenditures for the BOCC authorization. The prioritization criteria are as follows:

1. BOCC policy direction, guidance, or prior approval for an Expenditure Category or Service.
2. Recovery of the County's COVID-19 incurred and eligible expenditures.
3. Stakeholder requests for incurred or proposed eligible COVID-19 expenditures.
4. Stakeholder specified prioritization of proposed expenditures based on need, availability, and time for delivery of goods or services.
5. Availability, eligibility, and timing of FDEM funding.

Also included in the appendix is the uses and sources of the available funding. Based on the County's agreement with FDEM, the funding plan assumes that 75% of eligible expenditures are subject to reimbursement from FDEM. The plan further assumes that the BOCC, Elected and Constitutional Officers, and Municipal governments will be required to submit their plan to the BOCC for approval and will need to expend local funds prior to seeking reimbursement from the County. Entities will be eligible for reimbursement after the County has received reimbursement from FDEM.

## Recommendation

The Board should direct the County Manager's Office or designee to submit the Board approved *Nassau CARES* plan to the Florida Division of Emergency Management (FDEM) for consideration and provisional approval. The intent in submitting the plan for approval is to request that FDEM advance the remaining 75% allocation to Nassau County to execute the *Nassau CARES* plan.

An approved *Nassau CARES* plan would allow the BOCC to address the immediate public health needs associated with the COVID-19 pandemic while also positioning the County to anticipate future expenditure needs associated with potential additional waves of the virus, the 2020 Atlantic hurricane season, the 2020- 21 flu season, and other considerations. *Nassau CARES* has provided a basis for prioritizing the use of the CARES Act funds while balancing the County's continued efforts in providing citizens with support, relief, and an intentional focus on recovery.

Appendix

Uses of Funds				Sources of Fund			
Funding Source	Expenditure Category	Service	Program Allotment	Funds Available	BOCC Funds Needed	Non-BOCC	Total
25% DEM Allotment	Economic Support and Recovery	Small Business Recovery Assistance	\$ 2,420,000				
	Public Safety and Public Health Services	COVID-19 Expenditure Recovery	\$ 712,164				
		Facilities-Operations Improvements	\$ 333,958				
		Personal Protective Equipment	\$ 7,700				
	Social Services & Resident Needs	Food Stability	\$ 385,000				
Sub-Total			\$ 3,858,822	\$ 3,866,095	\$ -	\$ -	\$ 3,866,095
BOCC Funds Needed	Public Safety and Public Health Services	COVID-19 Expenditure Recovery	\$ 389,516				
		Facilities-Operations Improvements	\$ 2,306,300				
		Personal Protective Equipment	\$ 106,975				
		Re-Emergence Preparedness	\$ 580,374				
	Social Services & Resident Needs	Food Stability	\$ 417,498				
		Non-profit Support	\$ 55,000				
		Sub-Total			\$ 3,855,663	\$ -	\$ 3,848,390
Future FDEM Reimbursed BOCC	Economic Support and Recovery	Safe at Work	\$ 825,000				
	Public Safety and Public Health Services	Facilities-Operations Improvements	\$ 508,838				
		Non-Congregant Sheltering	\$ 132,000				
		Personal Protective Equipment	\$ 275,000				
		Re-Emergence Preparedness	\$ 275,000				
	Unmet Needs	Unmet Needs	\$ 2,537,820				
Sub-Total			\$ 4,553,658	\$ -	\$ 4,553,658	\$ -	\$ 4,553,658
Future FDEM Reimbursed Non-BOCC	Economic Support and Recovery	Safe at Work	\$ 161,293				
	Public Safety and Public Health Services	COVID-19 Expenditure Recovery	\$ 715,930				
		Facilities-Operations Improvements	\$ 1,561,700				
		Personal Protective Equipment	\$ 466,914				
		Social Services & Resident Needs	Food Stability	\$ 207,900			
	Non-profit Support		\$ 33,000				
	Social Service Agency Assistance		\$ 49,500				
	Sub-Total			\$ 3,196,237	\$ -	\$ -	\$ 3,196,237
Grand Total			\$ 15,464,380	\$ 3,866,095	\$ 8,402,048	\$ 3,196,237	\$ 15,464,380