**RRCI CARES ACT Funding Policy**

**RRCI** for Independence will follow all federal guidance and laws regarding CARE ACT Funding.

The CARES ACT provides $85 million in supplement funds to Centers for Independent Living (CILs) to respond directly to the COV-19 pandemic. The $85 million was distributed on April 21, 2020. CIL’s are directed to utilize the entirely of the funds to respond to the COVID-19 pandemic and the serge of needs of individuals with disabilities to access or reconnect with the services and supports they need to remain safely in their communities.

**RRCI** received $ 141,140.00 in CARE ACT funding.

**CARES ACT Funding**

**Funding Timeline:** Allowable expenses obligated from January 20, 2020 through September 30, 2021 can be paid for with CARES ACT funding.

**Carryover:** The project period for CARES ACT funds will expire September 30, 2021. This means a request for carryover from FY20 to FY21 is not necessary. CARES ACT funding must be obligated be September 30, 2021 and liquidated with 90 days (December 31, 2021).

**Impact on Next Year’s Funding:** The supplemental funds are part of a **one-time appropriation** from Congress in response to the COVID-19 pandemic.

**CARES ACT Award Number in PMS:** Once awarded, CARES ACT funds will appear in PMS with the same grant number as Part C funding, but with “ILC3” at the end. Funds drawn from “ILC3” must be tracked separately from normal Part Cfederal funding.

**CARES ACT Operational activities**

**Allowable CARES ACT Operational Activities and Expenses:** CARES ACT supplemental funding must be focused on responding to needs that are the result of the COVID-19 pandemic. There are no changes or expansions to the allowable expenses outlined in 45 CFR 75 or the Rehabilitation Act, as amended (Rehab Act). **RRCI** will review and follow the section on reasonable of costs in the Code of Federal Regulations (45 CFR 75.404)

All allowable expenses prior to the passage of the CARES ACT remain allowable.

The following are examples of allowable COVID-19 related costs. This list is not meant to be an exhaustive list as there may needs not know at this time.

1. **Technology:** Technology to enable and support the provision of services. Funds provide under the CARE ACT can be used to expand and or utilize technology for consumers and staff with the intent of reaching more consumers; this may include remote services delivery technology and equipment (e.g. web or cloud-based case management systems, laptops, cellphones, assistive technology, and telecommunication). Funding may also support the training necessary for consumers and staff to effectively utilize technology and equipment.

Consumers receiving technology must sign an equipment receipt, and agreement to attend future online activities. The receipt will show the technology belongs to **RRCI** for 6 months. After that time, the technology will belong to the consumer. **RRCI** will not replace an item that is broken by the consumer. Training on the use of the technology is required.

1. **COVID-19 Related Supplies:** Funds may be used to purchase goods and services that advance the safety and health of both staff and consumers before, during and after the delivery of direct services and activities intended to address COVID-19 related needs. Supplies such as masks and gloves are allowable. The purchase of personal care necessities (e.g. toilet paper, soap, and hand sanitizer) as well as life sustaining food for consumers who are unable to self-procure these supplies while following social distancing guidelines are allowed. **RRCI** will partner locally with other non-profit of social services agencies to coordinate on supplies and provisions.

Gift cards may be purchased for consumer use for those who meet RRCI qualifications listed in the CARES ACT Funding- Consumer Form. A list of items the consumer needs should be includes on the CARES ACT funding- Consumer form. A signature from the consumer receiving the gift card must be included on the receipt form. Gift cards will typically not be given in amounts greater than $200 at a time. A consumer may receive more than one gift card, not to acceded three, during the duration of CARE ACT funding.

1. **Other Items: RRCI** may purchase assistive technology for consumers who will benefit from receiving it immediately, in place of using the State AT funding. Justification why there is an immediate need is required.

Nursing facility transition and diversion will be high priority during the pandemic. Services and supports may include assistance with housing procurement, household items, or food.

1. **Salaries, Wages, and Leave:** ACL has released guidance based on temporary COVID-19 specific flexibilities granted by OMB. These flexibilities are in effect for 90 days or June 17th, at which point the flexibilities may be extended. This guidance may be accessed at: [https://acl.gov/sites/default/files/COVID19/C19FAQ-Grants 2020-03-03](https://acl.gov/sites/default/files/COVID19/C19FAQ-Grants%202020-03-03) pdf. Per this guidance, grantees may obligate salaries and benefits to currently active Federal awards consistent with the recipients’ policy of paying salaries under unexpected or extraordinary circumstances (such as the COVID-19 pandemic) from all funding sources.

~~Please note that this flexibility is only allowable if consistent with your CIL’s current and approved policies. Failure to have and follow established leave policies addressing these issues would render these expenses unallowable.~~

~~Due to the unprecedented nature of the COVID-19 pandemic, ACL understands that CIL’s may not have had all the policies and procedures in place that would address current and unusual circumstances. CIL’S should actively develop and/or update their policies and procedures as necessary and have them in place no later than May 31, 2020. Policies and procedures may be made effective retroactive to January 20, 2020. The following are recommended steps you and your leadership team can take:~~

* ~~Review the policy manual and identify the portion most applicable to the situation. Applicable leave may be a different category of leave.~~
* ~~The range of allowable activities that staff of a CIL can perform are extremely broad and as such there are any number of different ways a~~

~~CIL should therefore exercise caution before concluding that no work-related activities can be performed.~~

~~Please note that it is not an allowable use of Rehab Act or CARES ACT funds to pay wages or benefits for staff who have indicated (or agency leadership has determined) will not return to work. In this case the CIL would utilize policies related to separation of employees.~~

**Staff working from alternate locations during COVID-19**

**Telecommuting (RRCI employee handbook)**

Telecommuting, the practice of working at home or at a site near home instead of physically traveling to the Center, is a work alternative that may be offered to employees when it is beneficial to **RRCI** and reasonable accountability is ensured. Approval of telecommuting for the staff must be given by the Executive Director or in the case of the Executive Director, by the Board. In the event of a natural disaster (earthquake, pandemic, etc.), any federal or state rules/laws related to the disaster will be followed and supersede **RRCI** policy where applicable.

Salaries and pay for staff providing services from remote or alternative locations are allowable costs. Paid wages for staff who are NOT engaged in CIL activities, and have no plans to do so, are not allowable cost (see above guidance for coverage salaries and wages during COVID-19.) Please note this is not the same as paying costs related to an employee exiting their employment, (severance, leave cash out, etc.)

**Use of CARES ACT funding to Provide Services Outside Current Approved Services Area: RRCI** will provide services and carry out activities in the current approved program service area which includes, Washington County, Iron County, Beaver County, Millard County Kane County, Garfield County, Piute County, Sevier County, and Wayne County.

In the event another CIL in Utah can benefit from **RRCI** underutilized funds from CARES ACT funding, **RRCI** will consult with the Federal Program Officer and follow guidelines in the Disaster Services Policy for providing services outside the service area and insure SPIL.

**Services Provided in Response to COVID-19**

**Allowable CARES ACT CIL program activities:**

CARES ACT funding is to respond to the COVID-19 pandemic. Funding should support direct services and activities that help people with disabilities stay connected to or reconnect with the services and supports they need to stay safely in their homes. Appropriate areas of emphasis include:

* Services Coordination during and after the COVID-19 pandemic.
* Services and activities that assist individuals with disabilities who are at risk of being institutionalized to remain in their communities.
* Services and activities that assist individuals with disabilities to move from an institutional setting to a home in a community-based setting.
* Services and activities that address the shortage of accessible housing.
* Partnerships with local agencies that address food insecurity.
* Systems advocacy to ensure health equity in medical settings.

Whether or not a cost is allowable depends on many variables. Questions to consider include:

* Dose the cost align with the CARES ACT guidance provided in the CIL CARES ACT FAQ?
* Is the expense for an eligible consumer?
* Is the expense necessary to keep staff and/ or consumers safe during program related services and activities?
* Do the services address a need documented before or after COVID-19? Timing of the need may impact determination.
* Is the expense reasonable (45 CFR 75.403) and in accordance with other 45 CFR 75 requirements?
* Is the services or activities being performed in a consistent manner and according to current policy? NOTE: If a CIL does not have a relevant policy in place assure it is created and board approved before May 31, 2020.

Consumer Signatures: The Rehab Act is clear that Independent Living Plans must indicate agreement between staff and consumers. Any format, electronic or otherwise, is allowable if that agreement is documented. **RRCI** will utilize DocuSign to get signatures when possible. In the event the consumer does not have access to technology to allow an electronic signature, **RRCI** will note in the CIL Suite and on the form by indicating: **Consumer approval by phone due to COVID-19.** When the situation allows, staff will get consumer signatures.

**Capacity Building or Alteration of Services:**

Given the unprecedented nature of the pandemic, it is likely that demand for services will exceed **RRCI** current capacity. **RRCI** will utilize training provided by ACL and the IL-NET National Training and Technology Assistance Center on Independent Living on program-level and CIL-specific support. RRCI will proactivity seek assistance to serve the unique needs of the communities served, while utilizing the supplemental finds to address capacity shortfalls.

**Partnering with Other Non-Profit or Local Businesses:**

**RRCI** will partner with other non-profit, social services and local businesses to provide the needed services to people with disabilities i.e.: food pantries, shelters, transportation providers, and housing units.

**Reporting**

**Reporting Requirements Specific to CARES ACT supplemental Funding:**

CARES ACT funds have been issued under a separate grant award number; therefore, funds must be accounted for separately from the regular issuance of Independent Living Program funding. A separate supplement from will be required for financial report submissions. As with any award, **RRCI** is required to main sufficient documentation to support all chares against the Federal awards.

**Additional Resources**

* 45 CFR 75
* COVID-19 Aid, Relief, and Economic Security Act, Pub.L. 16-136
* HHS Grant Policy Statement Section ll-7

**Center Guidelines for Providing Services**

**Center and Staff Procedures (following State guidelines):**

1. Staff must wear a face mask when meeting face to face with other staff or consumers while in community settings during their regular scheduled hours. Masks will be provided by **RRCI.**
2. Staff should maintain social distancing of six feet in the office or on activities.
3. Frequently touched services will be wiped down regular with Clorox wipes.
4. A UV phone sanitizer will be purchased for staff to sanitize their cell phones.
5. Staff will wash their hands and use hand sanitizer regularly.
6. Staff will encourage consumers to wash their hands regularly.
7. Signs will be posted in all restrooms with proper hand washing techniques.
8. Staff may not come to work if they are symptomatic. Symptoms include:
9. Fever
10. Cough
11. Shortness of breath or difficulty breathing
12. Chills
13. Repeated shaking with chills
14. Muscle pain
15. Headaches
16. Sore throat
17. New loss of taste or smell

If you develop any of these for COVID-19 get medical attention immediately.

1. Trouble breathing
2. Persistent pain of pressure in the chest
3. New confusion or inability to arouse
4. Bluish lips or face
5. A sign will be posted on our office doors not to come on of you are sick or experiencing flu-like symptoms. Staff will work with consumers to reschedule or hold a meeting via internet or by phone.
6. Decisions regarding meetings and events will be made on a case by case basis.

**Consumer Procedures:**

1. Consumers are required to wear a face mask while riding in any of the vehicles, including the bus, or attending **RRCI** activities unless doing so is precluded by their disability. **RRCI** will provide disposable masks for consumer use.
2. Consumers should always be reminded of social distance.
3. Consumers should be spaced on the bus to allow for social distancing.
4. Consumers coming to RRCI for meeting or activities will be asked about their health before being allowed to participate. Any consumer with any symptoms will not be allowed to participate.

**Coronavirus Disease 2019 (COVID-19) FAQs**

What is COVID-19? A respiratory illness that can spread from person to person.

How does it spread? The virus is thought to spread mainly between people who are in close contact with one another (within about 6 feet) through coughing or sneezing or touching a surface/object that has the virus on it.

What are the symptoms?

1. Fever
2. Cough
3. Shortness of breath or difficulty in breathing
4. Chills
5. Repeated shaking with chills
6. Muscle pain
7. Headaches
8. Sore throat
9. New loss of taste or smell

If you develop any of these for COVID-19 get medical attention immediately.

1. Trouble breathing
2. Persistent pain or pressure in the chest
3. New confusion or inability to arouse
4. Bluish lips or face

Who is a risk of serious COVID-19 illness? Older adults, people of all ages with serious chronic medical conditions like heart, lung, or kidney disease.

What can I do to prevent the spread of respiratory diseases (cold, flu, and COVID-19)?

* Avoid close contact with people who are sick.
* Avoid touching yours eyes, nose, and mouth.
* Stay home when you are sick.
* Cover you cough or sneeze with a tissue, then then throw the tissue in the trash.
* Clean and disinfect frequently touching objects and surfaces.
* Wash your hands frequently for at least 20 seconds.

If you are at higher risk, the Center of Disease Control and Prevention (CDC) recommends you:

* Stay at home as much as possible if COVID-19 is spreading in your community.
* Make sure you have access to several weeks of medications and supplies in case you need to stay home for prolonged periods of time. Visit the website to view the CDC Plan Ahead and Be Ready guide.
* When you go out in public, keep away from others who are sick, limit close contact and wash your hands often.
* Avoid crowds, especially in poor ventilation spaces.
* Avoid cruise travel and non-essential air travel.
* Stay up to date on CDC Travel Health Notices.
* Plan now for what you will do if you, or people you rely on for support, become ill.

If you have any questions or concerns about your preparation for COVID-19, do not hesitate to reach out to RRCI Independent staff.

Additional comments from ILRU:

* Keep 6 feet or more distance
* Limit gatherings to no more than 10

**Resources:**

Administration for Community Living: “What do Older Adults and People with Disabilities Need to Know?” <http://acl.gov/COVOD-19>

Center for Disabilities Right: Action Steps for Attendant Services Users in Response to Coronavirus Disease 19 (COVID19) [http://cdrnys.org/blog/programs-services/action-steps-for -attendant-service-users-in-response-to-coronavirus-disease-2019-covid-19/](http://cdrnys.org/blog/programs-services/action-steps-for%20-attendant-service-users-in-response-to-coronavirus-disease-2019-covid-19/)

Centers for Disease Control and Prevention: Comprehensive guide to coronavirus disease2019 ( COVID-19) <https://news.nnim.gov/gmr/2020/02/covid-19-coronavirus-for-public-libraries/>

The Center for START Services: COVID-19 Resources ( Resources geared toward supporting individuals with IDD and their families, including resources for language access and translated materials are being updated daily) <https://www.centerforstartservices.org/covid-19-resources>

Video: What You Need to Know About Coronavirus (In ASL) What You Need to Know About Coronavirus (In ASL) <https://www.youtube.com/watch?v=Uu7PRKG1_s&feature-yoytu.be>