Treasury Issues New Guidance on “Costs Incurred” for CARES Act Funds

On June 30, 2020, Treasury updated their guidance on “costs incurred” stating that “for a cost to be considered to have been incurred, performance or delivery must occur during the covered period but payments need to be made during that time (though it is generally expected that this will take place within 90 days of the cost being incurred.” The new guidance goes on to say, “Furthermore, in all cases it must be necessary that performance or delivery take place during the covered period. Thus the cost of a good or service received during the covered period will not be considered eligible under section 601(d) if there is no need for receipt until after the covered period has expired.” This new guidance can be found at: https://home.treasury.gov/system/files/136/Coronavirus-Relief-Fund-Guidance-for-State-Territorial-Local-and-Tribal-Governments.pdf.

Department of Labor Guidance for Administration of UI Reimbursements

Reimbursement-option tribal employers may be receiving invoices for unemployment insurance claims from California. Of particular importance from the guidance is, “Whether the state requires reimbursing employers to pay monthly or quarterly, the employer must pay their bill in full before reimbursement can be processed. The guidance can be found at: https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=5893.

If you have questions about new guidance, feel free to reach out to CILS and we can help your tribe interpret the new guidance from Treasury and DOL.

Executive Order N-71-20

On June 30, 2020, Governor Newsom signed Executive Order N-71-20 in response to COVID-19. The Executive Order addresses many issues including: (1) extending authorization to halt evictions for renters impacted by the COVID-19 pandemic until September 30 (the previous order halted evictions until July 28, 2020); (2) waiving eligibility re-determinations for Medi-Cal; (3) extending waivers for CalWORKs applications through self-attestation and in-person identification requirements. The Order can be found at: https://www.gov.ca.gov/wp-content/uploads/2020/06/6.30.20-EO-N-71-20.pdf.

California Counties Mandated Closures Due to COVID-19 Uptick

California is monitoring counties that have an uptick of COVID-19 cases and will place counties on a “County Monitoring List.” Any county that reviews on the list for 3 consecutive days will be required to shut down certain industries. For more information, visit the California County Monitoring website at: https://covid19.ca.gov/roadmap-counties/.

**San Diego County will be added to the Monitoring List on July 3.

Tax Filings – Upcoming Deadline

In response to COVID-19, Federal and California tax deadlines were postponed until July 15, 2020. If you are low-income and need assistance filing your taxes, visit this website to find a Low Income Taxpayer clinic near you: https://irs.treasury.gov/freetaxprep/.
New CDSS Foster Care Guidance Related to COVID-19

1. On June 26, 2020, California Department of Social Services (CDSS) issued All County Letter (ACL) No. 20-74 and Under ACL 20-74, CDSS extended previous guidance relating to foster youth status verifications, reunification assessments, and placement preservation for foster youth who have been exposed to COVID-19. ACL 20-74 can be found at: https://cdss.ca.gov/Portals/9/Additional-Resources/Letters-and-Notices/ACLs/2020/20-74.pdf.

Reunification Assessments: ACL 20-58 issued on May 19, 2020 addressed how child welfare agencies were to assess and provide family support and reunification services for children and their families during the pandemic. ACL 20-58 was set to expire on June 30, 2020, but ACL-20-74 extended this guidance for the duration of the COVID-19 State of Emergency as declared by Governor Newsom.

Placement Preservation: Previous guidance under ACL 20-33 that focuses on preserving placement for foster youth who have been exposed to COVID-19 has been extended for the duration of the COVID-19 State of Emergency as declared by Governor Newsom.

Foster Youth Status Verification: Under Executive Order N-68-20, temporary waivers were issued relating to foster youth verification of their current or former foster youth status to access programs providing cellphones and other communication technology to foster youth. Under this ACL, the waiver has been extended to August 4, 2020.

2. On June 29, 2020, CDSS issued All County Information Notice (ACIN) No. 1-54-20. ACIN 1-54-20 was developed to provide information to child welfare agencies on engaging, supporting, and assisting families in navigating the child welfare system. The ACIN also provides guidance on working with Indian families and the importance of keeping tribes involved in the decision-making processes. The ACIN can be found at: https://cdss.ca.gov/Portals/9/Additional-Resources/Letters-and-Notices/ACINs/2020/I-54_20.pdf.

3. On June 17, 2020, CDSS released ACL 20-70 advising agencies and probation departments to resume in-person visits. However, due to the uptick of COVID-19 cases in California, CDSS issued the superseding ACL 20-73 on June 26, 2020 waiving the in-person visits for child welfare agencies and probation departments for the duration of the COVID-10 State of Emergency.

If any new CDSS guidance is affecting your case, please reach out to your local CILS office for further assistance.

SCAM ALERT: Utility Imposter Fraud

National Consumers League (NCL) reported an increase in scams during the COVID-19 pandemic. Scammers are taking advantage of people out of work and calling individuals stating that their utilities will be disconnected. Here are some tips to spot a scam from NCL (fraud.org):

1. During the COVID-19 pandemic, all 50 states have place moratoriums on disconnections.
2. A utility company will never initiate a disconnection without contacting you via the mail first. If you receive a call from someone claiming they will turn off your utilities, hang up and call your utility company.
3. Beware of unusual payment methods for the utility such as wire transfers, gift cards, bank-to-bank transfers, or bitcoin. These payment methods are used often by scammers.
4. Do not give out personal information! Many scammers will claim they need to verify your information, but they are trying to collect information on you. If this happens hang up and call your utility company directly.

If you have any questions, contact your local CILS office for more info! Also, NCL’s article can be found at: fraud.org/alerts.

Senate Oversight Hearing on “Evaluating the Response and Mitigation to COVID-19 Pandemic in Native Communities”


REMINDER: Pandemic EBT Deadline July 15

Households with children eligible for free or reduced-price meals at school may receive $365 per eligible child on their P-EBT card to use on food and groceries. The deadline to apply is July 15, 2020.
TRIBAL FUNDING RESOURCES

IHS Tribal Management Grant Funding Opportunity. This competitive capacity building grant is available to federally recognized tribes and tribal organization with the purpose of developing infrastructure and analyzing current programs to improve management and organization systems. More information can be found at: https://www.federalregister.gov/documents/2020/06/23/2020-13470/office-of-direct-service-and-contracting-tribes-tribal-management-grant-program.

Don’t forget…

FCC – COVID-19 Telehealth Program. Provides eligible health care programs support in purchasing telecommunications, information services, and connected devices necessary to provide telehealth services to patients in response to COVID-19. More information can be found at: https://www.fcc.gov/covid-19-telehealth-program.
There is currently no deadline.

Health Resources and Services Administration (HRSA) Federal Office of Rural Health Policy (FORHP). Grant will support recipients who seek to engage high-risk populations and provide substance use disorder/opioid use disorder prevention, treatment, and recovery services. For more information see: https://www.grants.gov/web/grants/view-opportunity.html?oppId=324246.

USDA – The CARES Act Distance Learning and Telemedicine Program. Focuses on helping rural communities use telecommunications to connect teachers and medical service providers. For more information see: https://www.rd.usda.gov/programs-services/distance-learning-telemedicine-grants.

There is no deadline.

How Can CILS Help?

Grants - CILS staff can discuss whether the tribe is eligible for a grant and in preparing documentation.

CARES Act Distribution -

1) Ensuring your tribe will be able to meet reporting requirements;
2) Assisting the tribe in assessing what its COVID-19 related costs and needs are; and/or
3) Providing guidance on what is and is not allowable expenditures.

For assistance contact the CILS office closest to your tribal location at:

<table>
<thead>
<tr>
<th>Office</th>
<th>Phone</th>
</tr>
</thead>
<tbody>
<tr>
<td>Escondido Office</td>
<td>(760) 746-8941</td>
</tr>
<tr>
<td>Bishop Office</td>
<td>(760) 873-3581</td>
</tr>
<tr>
<td>Eureka Office</td>
<td>(707) 443-8397</td>
</tr>
<tr>
<td>Sacramento Office</td>
<td>(916) 978-0960</td>
</tr>
</tbody>
</table>
TRIBAL COVID-19 RESOURCES

For updates on COVID-19 and Resources for Tribal Communities see the following links:

State of California:

- A one-stop page collecting information related to COVID-19 can be located at: [https://covid19.ca.gov/]()

Federal Resources:

- A one-stop page for Federal COVID-19 information: [https://www.coronavirus.gov/].
- Indian Health Service: [https://www.ihs.gov/coronavirus/].
- Health and Human Services: [https://www.hhs.gov/coronavirus/index.html].
- Centers for Disease Control: Providing information on how to protect yourself and what to do if you are sick. Also contains the most update-to-date information on the virus and medical news related to the virus: [https://www.cdc.gov/coronavirus/2019-ncov/index.html].
- Office of the Assistant Secretary for Preparedness and Response: [https://www.phe.gov/emergency/events/COVID19/Pages/default.aspx].
- Treasury: For more information on CARES Act funding and distributions. [https://home.treasury.gov/policy-issues/cares/state-and-local-governments].

Tribal Specific Webpages with Daily Updates

- NCAI: [http://www.ncai.org/covid-19].
- TPLI: [https://www.home.tlpi.org/covid-19].
- NICWA: [https://www.nicwa.org/coronavirus/].
- NIHB: [https://www.nihb.org/covid-19/].
- Turtletalk: [https://turtletalk.blog/covid-19-tribal-documents] and [https://turtletalk.blog/tag/covid-19/].