

COVID-19 Expenditure Tracking and Reporting Guidance for Human Service Providers
Topic: Claiming and Documentation Retention for COVID-19 Expenditures
May 2020

Overview

The City remains committed to reimbursing providers' contracted expenses for COVID-19 response, pursuant to the revised scopes of work developed and authorized in collaboration with City contracting agencies.

Providers are to maintain records of all COVID-19 expenditures and provide upon request. Digital copies are acceptable. Providers are required to create separate cost centers or grant codes within their organization's financial management systems to track costs related to COVID-19. All City contracts remain subject to audit, including emergency contracts, amendments, or change orders that are received for COVID-19 response.

This guidance provides best practices for contracted providers to track and report COVID-19 related expenses, based on prior experience with federal disaster and emergency grants.

COVID-19 Related Expenditures

The City defines a "COVID-related expenditure" as one that a provider or agency would not have otherwise incurred if not for the COVID-19 emergency, regardless of whether such cost can be paid for within the provider's existing contract budget.

COVID-related expenditures would likely include, but are not limited to, such costs as:

- Incremental or new costs outside the scope of pre-COVID budgets
- Personnel expenditures related to the redeployment of staff to COVID-19 response activities, overtime or temporary staff to address issues of shift coverage and extended service hours related to COVID-19 response (e.g. extending the day for Grab & Go or Home delivered meals)
- Laptops that are purchased to allow staff to perform their usual job from a different location
- Rent for sites that would not be utilized for the current purpose if not for this emergency (e.g. Regional Enrichment Centers)
- Home-delivered meals that are provided in lieu of on-site congregate meals
- Materials and supplies required to support COVID-19 response, such as Personal Protective Equipment (PPE) and additional cleaning expense

COVID-related expenditures would likely not include such costs as:

- Wages/fringe for staff who are performing their usual job from a different location, e.g. remotely
- Ongoing services that are now taking place remotely, e.g. virtual socialization services

COVID-19 Invoice Submission Process

To facilitate reimbursement for COVID-19 expenses, please see [Guidance for COVID-19 Invoice Submission](#) found on nyc.gov/nonprofits.

Documentation Retention

The City is asking contracted providers to retain all COVID-19-related documents and records. In addition to retaining required documentation and records defined below, providers should record, and make available upon request, a narrative explanation that summarizes how activities and services directly relate to COVID-19 response and work. The narrative should directly relate to the services and expenses submitted for reimbursement on COVID-19 invoices per category, as defined below.

1. Labor

Providers should ensure that employees across the organization maintain practices as outlined in the organization's operating policies and procedures or human resources manual, follow consistent timekeeping practices, record straight time vs. overtime, and include a description of work.

Timesheets for each individual employee should include the following details:

- Employee name
- Job title and function
- Type of employee (e.g., full-time exempt, full-time non-exempt, part-time, temporary, etc.)
- Days and hours worked and location of work performed
- COVID-19 vs. standard work hours, by individual days or within each day, including overtime hours
- Pay rate(s) and fringe benefit rate(s)
- Description of tasks completed to support labor time and explanation of the COVID-19 related reason for activities that are above and beyond standard operations

2. Supplies

In-stock Supplies: For inventory that has already been purchased and available on site, but is used for COVID-19 related emergency response, providers should maintain the following protocols:

- Maintain a separate COVID and non-COVID inventory log of materials and supplies, including the type of supplies, unit costs, quantities used, and site or location used, accompanied by support documentation, such as daily logs, and justification of use for COVID-19-related activities
- Maintain historical cost records, including receipts, purchase orders, and remittance documentation

Purchased Supplies: For supplies purchased related to COVID-19, providers should maintain all records. This includes, but is not limited to, the following:

- Receipts and invoices that include the quantities of materials and supplies purchased and unit costs
- Credit card statements that reflect payment for purchases
- Justification of usage of purchased supplies for COVID-19 related activities

3. Equipment

Provider-Owned Equipment: For equipment that has already been purchased and used for COVID-19 related emergency needs, providers should maintain the following protocols:

- Type of equipment and attachments used, including year, make, and model
- Locations, days, and hours used (usage logs)
- Document COVID-19 purpose of equipment purchase

Rented or Purchased Equipment:

- Rental or lease agreements, invoices, receipts
- Days used
- Document COVID-19 purpose for rentals

4. Contracts

This includes, but is not limited to, agreements for the purchase of goods and services for exigency/emergency procurement needs as related to COVID-19. Providers should maintain the following documentation:

- Copies of executed amendments, agreements, or sub-contracts that contain narratives to describe COVID-19 related work performed

On any of the above, the City may evaluate cost reasonableness and request documentation on how prices were determined (e.g. book value for a vehicle).

The following services, activities, and costs are ineligible:

- Costs that have been or will be submitted for reimbursement through insurance
- Cost that have been or will be submitted for reimbursement by other Federal or State contracting entities
- Costs that have been or will be submitted for reimbursement by other grantors or private funders
- Costs related to the application of an organization's indirect cost rates
- Cost Plus Percentage of Cost (CPPC)