

**CORONAVIRUS AID  
RELIEF AND  
ECONOMIC SECURITY  
(CARES ACT)**

**PROGRAM GUIDANCE  
FOR DOMESTIC  
VIOLENCE SERVICES**

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LOS ANGELES COUNTY DEPARTMENT OF PUBLIC HEALTH, OFFICE OF WOMEN'S HEALTH  
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## INTRODUCTION

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The Coronavirus Aid, Relief, and Economic Security (CARES) Act is a legislative package approved by Congress in response to the COVID-19 pandemic. The CARES Act provided financial assistance and resources to assist various sectors including small businesses, workers, state and local governments, as well as other programs critical to the COVID-19 response. While health leaders encourage us to stay home to reduce transmission of the COVID-19 virus, we also know that home is not safe for many adults and children. Avoiding public spaces and working remotely can help to reduce the spread of COVID-19, but for many survivors of domestic violence/intimate partner violence, staying home may not be the safest option.

In the current context of the COVID-19 pandemic, persons who harm may exert further power and control over their partners because of economic and other uncertainties surrounding the pandemic. With the state and county's Safer-at-Home order in effect, victims are more socially isolated and have fewer opportunities to connect with others who can potentially assist. They may be less likely to use crisis hotlines with their abusers close by and may face harmful repercussions if they reach out for help.

COVID-19 has created significant barriers for those providing DV shelters and services. In the face of increasing demand, shelters must limit capacity in order to afford appropriate distance between clients. Providers must develop new, and often costly, ways to deliver services that protect clients, staff, children and the community. As new procedures are put in place in other systems, such as the court system, providers are challenged to provide access even when the system itself is struggling. Client and staff need, including everything from food to WiFi, continue to increase and impose additional stresses.

During this uncertain time, DV providers may refer to DPH website (<http://publichealth.lacounty.gov/media/Coronavirus/guidances.htm>) to learn more on how to keep your facility, shelter, staff, clients and residents safe from COVID-19.

### Purpose of the CARES Act Funds

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The purpose of the CARES Act Fund is to assist Domestic Violence service providers by covering necessary expenses incurred **due to** the COVID-19 public health emergency. Services provided under this funding are to assist domestic violence survivors that are **directly impacted** by COVID-19. These funds may be used to cover expenses that took place between March 1, 2020, and December 30, 2020. However, these funds may not supplant other program funding. The following information is intended to offer support and guidance to contractors on how funds can be spent. Federal guidelines will impose more rigorous reporting and tracking. Organizations receiving CARES Act funds must adhere to requirements, terms and conditions of CARES Act funding.

## DIRECT SERVICE PROVISION

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Direct services include services that your staff provide directly to clients. In order to determine whether someone is eligible as a CARES Act client, an Intake must be conducted prior to service provision.

### Intake

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Intake question will help service providers identify and document clients' needs as a result of COVID-19. Once issues are identified, classify the individual as a CARES Act client, then all non-direct and direct services noted hereafter can be provided under CARES Act funding. For instance, a client who could no longer stay in a home with the person who harms because the abuse intensified due to or as a result of the environment created by the COVID-19 Stay At Home order, job loss and/or potential eviction. Below is a sample of the intake form which can be accessed here:

<http://publichealth.lacounty.gov/owh/OWHContracts/CARESAct/CARESAct.htm>

AGENCY NAME: \_\_\_\_\_ CLIENT RECORD NUMBER: \_\_\_\_\_

CLIENT NAME \_\_\_\_\_ DATE OF BIRTH \_\_\_\_\_

Preferred Language? \_\_\_\_\_

**ETHNICITY:**  American Indian  Asian/Pacific Islander  African-American  Hispanic/Latinx  
 White/Caucasian  Mixed race  Unknown

**GENDER**  Female  Male  Transgender (F to M)  Transgender (M to F)  
 Declined to State

**CONTACT INFORMATION:** Phone number: \_\_\_\_\_ Okay to leave message?  Yes  No  
Email: \_\_\_\_\_ Client has access to safely check email?  Yes  No

**CLIENT NEEDS OVERVIEW:**

Household Income: \_\_\_\_\_ Number in household: \_\_\_\_\_

Does client have COVID-related legal issues?  Yes  No Needs legal assistance?  Yes  No

Does client have limited food due to COVID?  Yes  No Needs food assistance?  Yes  No

Does client have COVID-related transportation issues?  Yes  No Needs transportation assistance?  Yes  No

Does client have mental health stress due to COVID?  Yes  No Needs mental health assistance?  Yes  No

**HOUSING STATUS:** Is client currently fleeing a domestic violence living situation due to COVID?  Yes  No

Client needs immediate emergency shelter/housing  Client needs to be quarantined

**INTAKE RESULTS:**

Client has COVID-related service needs  Client has no COVID-related service needs

## Counseling Services

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The COVID-19 pandemic has added additional stress and anxiety to an already stressful time. Additional services may be needed to help clients and their families deal with COVID-19 related issues. Examples include counseling and support due to:

- A COVID-19 related death;
- Job loss due to COVID-19 closures;
- Family tension due to being confined at home or in quarantine due to COVID-19;
- Academic stress due to closure of school and transition to virtual learning due to COVID-19;
- Social anxiety due to being isolated, not being able to see family or friends due to COVID-19.

Counseling Services are participant centered and consist of individual, family (participant and child/adolescent), or group counseling and education. Services shall be provided by a licensed, or non-licensed clinician, or a para-professional trained specifically in domestic violence counseling. Counseling Services shall be focused on strength-based methods and interventions for enhancing, empowering and motivating participants to build positive behaviors and self-regard (i.e., increase safety; address his/her emotional, social, vocational, educational, and health needs; promote the recovery of the adult survivor/children from the immediate and long-term effects of domestic violence; identify and achieve personal and emotional well-being).

## Case Management Services

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With the influx of uncertainty, clients may need additional case management time to navigate COVID-19 related issues and DV care. Examples of COVID-19 related case management:

- Arranging hotel/motel for quarantining individuals and/or families;
- Arranging hotel/motel for emergency DV shelter;
- Coordination of COVID-19 testing and medical care for client and/or family;
- Coordination and advocacy for housing issues such as safety and eviction due to COVID-19;
- Coordination of licensed mental health services due to COVID-19 related incidents;

Case Management expenses include personnel time for COVID-19 assisted coordination for housing stability, legal issues, coordination of medical and mental health.

## Legal Services (Non-Immigration Services)

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Legal Services shall be provided to participants to ensure that participant's rights are preserved and that issues are resolved with their best interest and safety in mind. Legal Services (Non-Immigration Services) expenses related for attorney and paraprofessional staff. This includes:

- Legal services related to housing disputes (evictions, rent negotiations) due to COVID-19 related loss of and/or threatened loss of housing;
- Restraining Orders as it relates to DV safety and COVID-19;
- Benefits Assistance services as it relates to COVID-19;
- Court related court fees for virtual court appearances,
- Virtual environments (conference room, consultation room) that can be used for on-site consultation with clients and with the court.

**The CARES Act Fund will not reimburse expenses for immigration related legal services.**

Legal Services Provider shall ensure that written documentation requirements are not in conflict with the relevant California State laws regarding Attorney-Client confidentiality and the Attorney-Client and Attorney-Work Product privileges.

### Mental Health Services

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The COVID-19 pandemic has added additional stress and anxiety to the lives of DV survivors. In addition to safety, COVID-19 has brought about strong feelings of the unknown. The mental health of DV clients is at risk for depression and other triggers brought on by stress and anxiety during this time. Mental Health Services include expenses for therapy for clients and their families provided by a licensed mental health provider as it relates to COVID-19. Mental health episodes brought about by COVID-19 related episodes or experiences includes:

- Depression
- Harm to others or suicidal thoughts
- Substance abuse
- Trauma

### Childcare

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Childcare Services are defined expenses to cover the costs of the day care of program staff whose minor children of who are unable to attend school, afterschool programs, preschool and childcare daycare centers due to closures driven by COVID-19. This is to allow program staff the means to continue to serving agency DV clients.

## **NON-DIRECT SERVICES**

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Non-Direct Service Expenses pertain to items, services and expenditures that were accrued due to the COVID-19 pandemic. These expenditures should not have been accounted for in your organizations' budget as of March 27, 2020 and costs need to be specifically incurred due to the COVID-19 public health emergency. Items purchased with CARES Act funds become the property of the client and the client **is not** obligated to return the property upon leaving the program.

## Necessity of Life Assistance

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Necessity of Life assistance is for emergency COVID-19 related items purchased by the contractor and distributed to a client who has been identified as needing domestic violence assistance **due to or as a result of COVID-19**. Food vouchers and transportation costs for necessities of life includes the costs of food, gas, bus or metro passes, and other personal care items (such as food vouchers, shampoo, toothpaste, deodorant, diapers, and other personal care items) for domestic violence survivors and their family members who do not have these items because they are fleeing or have fled a domestic violence situation as a result of escalating violence or abuse at home due to COVID-19.

Contractor may purchase food vouchers, gas cards, metro passes, and/or grocery/department store gift cards for clients in need of the above necessity of life items. Such distributions shall not exceed \$200 per month per client plus an additional \$50 per month per family member served under this agreement, not to exceed \$500 per month per family. **No cash shall be distributed directly to clients. Cash distributions will not be reimbursed.**

Contract providers are responsible for ensuring the cards are properly secured and accounted for by maintaining a gift card tracking system that includes the following information, at a minimum:

- Gift card vendor name (Such as Ralph's, Target, etc.)
- Gift card serial number
- Date gift card was issued
- Name of client gift card was issued to
- Signature of client upon receipt of gift card
- Gift card balance
- Copies of receipts for purchases of gift card
- Name and signature of authorized personnel who issued the gift card.

This gift card tracking system shall include a tracking log/database and internal procedures and controls including, but not limited to, dispersal and safety/security of the gift cards and how the items or services purchased relate to the client's service plan. The log/database should also be used to keep track that gift card distribution does not exceed the maximum amount for each client/family. Internal procedures should also include procedures to make clients aware of the non-allowable purchases when using gift cards. This information shall be available for review by DPH designee(s) upon request.

In compliance with the County's fiscal policy and procedures, DV contractors and directly operated programs are required to report all unused gift cards on or before December 30, 2020. Gift card inventories, as well as all CARES ACT expenditures, are subject to random audits by DPH and/or the Office of the Auditor-Controller at any time.

## Personal Protective Equipment (PPE)

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Personal Protective Equipment including expenses for purchasing and distribution of medical and protective supplies (e.g., sanitizing products and personal protective equipment (PPE) for staff and shelter residents are imperative to keeping staff, clients and shelter residents safe. Contractor shall have an agency wide plan for COVID-19 and other infectious disease control for their domestic violence shelter.

## Cleaning and Janitorial Deep Cleaning Expenses

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Cleaning, Janitorial Deep Cleaning expenses for disinfection of shelter facilities where clients are housed in response to the COVID-19 public health emergency. Cleaning frequently throughout the day is recommended in shelter facilities in high touch areas such as doorknobs and elevator buttons. For additional information see [General Cleaning Guidance for Respiratory Illness in Group Settings](#).

## Technological Expenses

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Technology is essential for staff, clients and families in order to continue to maintain communication and meet the needs of the client and their families during the COVID-19 pandemic.

**Technology for Agency/Organization** include expenses to improve telework capabilities for employees to enable compliance with COVID-19 public health precautions, including upgrading office computers and network to support virtual business needs, providing laptops for staff to telework, providing technology training to teleworking staff and working virtually with clients, purchasing subscriptions to web-based meeting applications. Contractor should weigh different options for internet access payments through December 30, 2020. If items or services have already been paid by DPH programs, you cannot be reimbursed through the CARES Act funds. Contractor will provide paid receipts for goods purchased with monthly invoice.

## Emergency Housing/Hotel Shelter Services

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Emergency housing expenses for quarantining individuals, care for individual to mitigate COVID-19 effects and enable compliance with COVID-19 public health precautions (e.g., hotel bed nights for clients and their families who were diagnosed with COVID-19, exhibited symptoms or had exposure to someone with COVID-19) is an allowable expense provided that the client was not enrolled in any other city, county or state emergency housing program.

Contractor shall provide justification of emergency housing for each client/family. It will be noted in client file and/or CARES Act documentation folder. Justification note will include:

- a. Hotel/Motel Name
- b. Number of Rooms
- c. Check In/Out dates

Clients who have experienced job loss due to COVID-19 are challenged with adequate food for their families. Clients and their family who have fled their homes due to domestic violence may be sheltered in hotels/motels with no access to food preparation or refrigeration. Meals prepared and delivered to clients and their families are an allowable cost.

## BUDGET DEVELOPMENT

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CARES ACT Funding Requirements:

- Funding may be used for COVID-19 related cost that occurred between March 1, 2020 through December 30, 2020.
  - COVID-19 related expenditures cannot be reimbursed recouped if paid for by other federal, state, city or Los Angeles County program funds.
  - Reimbursable expenditures are for items and services that were unexpected expenses due to the COVID-19 pandemic. These expenditures were not accounted for in your organizations' budget as of March 27, 2020. Cost were specifically incurred due to the COVID-19 public health emergency.
- Program must follow Generally Accepted Accounting Principles
  - Documentation for paid services and supplies are to be provided with all invoices at the time of submission.
  - Administrative costs **may not** exceed 10% of direct costs
- Funds **may not** be given directly to clients receiving domestic violence services at your organization.

Please see screenshot of the budget form on the next page.







## INVOICING/BILLING

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Contractor will submit a monthly CARES Act Invoice Form (March 2020- December 2020) for all reimbursable expenditures related to COVID-19. Services provided under this funding must be necessary and directly related to additional costs/services as a result of COVID-19. Also, the expenditures must not be accounted for under any other funding source.

Contractor shall itemize the expenses claimed on the CARES Act Expense Reimbursement Claim Form. Failure to submit claims on a monthly basis impedes the efficiency of the reimbursement process significantly. Claims that are not submitted in a timely manner each month may be subject to delays.

Contractors are required to itemize monthly CARES Act expenditures into the CARES Act Invoice Form before submitting it to DPH for review and payment. The CARES Act Invoice Form is an Excel spreadsheet designed to allow contract providers to easily enter their expenses into a self-calculating template.

### Submission of Reimbursement Documents

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Receipts and other supporting documentation of costs paid shall be submitted with invoices for non-direct service costs.

The itemized CARES Act Invoice Form must be accompanied by paid receipts for goods or services purchased during that month. The CARES Act Invoice Form will be due 15th of the month following the month services were provided.



Instructions on Completing the Invoice

Personnel

List the employee name, payroll title, number of months, monthly salary and time spent providing CARES Act services. Total hours and hourly rate (in blue) will automatically calculate based on that data.

Employee Name (Only List Employees Who are Directly Working on CARES Act Duties)	Payroll Title	Number of Months	Monthly Salary	% of FTE Spent on CARES Act Duties	Total Hours*	Hourly Rate	Number of Hours						Total Hour	Actual Costs									
							Intake	Case Management	Legal Services	Counseling Support	Mental Health	Child Care		Intake	Case Management	Legal Services	Counseling Support	Mental Health	Child Care	Total Cost			
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## REPORTING

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Due to the short timeline of the CARES Act Fund, the months of March 2020-August 2020 will be compiled and submitted by **October 15, 2020**. The Monthly Service Report will be due on the 15<sup>th</sup> of the month with the monthly invoice thereafter. The final report is due January 30, 2021.

The Monthly Service Report is designed to capture the number of COVID-19 related services performed, demographic profile of those served and personnel hours dedicated to COVID-19 service delivery. This information is compiled as a condition of the CARES Act.

I. Number of clients served

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I - NUMBER OF CLIENTS SERVED		March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Total Unduplicated
1.	Number of New CARES Act Clients	0	0	0	0	0	0	15	20	10	15	60
2.	Number of Returning CARES Act Clients	0	0	0	0	0	0	0	15	10	20	
3.	Total Number of CARES Act Clients Served	0	0	0	0	0	0	15	35	20	35	

1. Number of **NEW** clients – This is the number of clients that have not previously been served and/or reported under the CARES Act program.
  - a. For the first month that services were provided, ALL clients are considered NEW.
  - b. **Demographics** – enter demographic information (section II) for all NEW clients.
2. Number of returning clients – This is the number of clients that were previously served and reported under the CARES Act program. Since these clients were previously served and reported, do **NOT** enter demographic information for returning clients.
3. Total number of clients – automatically calculated sum of numbers 1 and 2.

## II. Client Demographics

Enter demographic information for NEW clients ONLY for all demographic sections: Gender, Age, Sexual Orientation, Relationship and Disability Status, Income, Race/Ethnicity and Language. If the information is unattainable, use "Unknown/Decline to State." Do not enter demographic information for RETURNING clients.

II. CLIENT DEMOGRAPHICS												
A. GENDER												Total Unduplicated
1.	Female											0
2.	Male											0
3.	Transgender (Male to Female)											0
4.	Transgender (Female to Male)											0
5.	Other											0
6.	Unknown/Declined to State											0
<b>Total number of clients served by gender:</b>		<b>0</b>										

## III. Services Provided

Enter the number of clients provided with non-direct services.

III. Number of Clients Provided with Non-Direct Services												
1.	Transportation											0
2.	Necessities of Life											0
3.	Emergency Housing/Hotel											0
<b>Total number of Clients:</b>		<b>0</b>										

See Instruction tab on the bottom of the Monthly Service Report for further details.

## DOCUMENTATION REQUIREMENTS

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Contractor is required to maintain separate CARES Act file with documentation of services provided and/or supplies as it pertains to COVID-19 related expenses.

### Client Records

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Contractor shall document justification for all direct and in-direct services related to CARES Act Fund. Client case notes must be provided for all CARES Act expenditures. Case notes shall contain the date, COVID-19 related service(s), justification and name/signature of authorized staff for services provided. Case notes must be maintained in the client CARES Act file.

Contractor shall document justification of emergency housing/shelter bed night services provided to each client/family. Documentation shall be noted in the client file and/or CARES Act client folder and shall include:

- Justification of using CARES Act Funding for this client
- Hotel/Motel name where client is sheltered
- Room Number
- Length of stay, to include client check in/out dates
- Receipt for the stay detailing charges paid

### Record Retention Requirements

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Records to support compliance with subsection 601(d) of the Social Security Act (42 U.S.C 801(d)), may include, but are not limited to, copies of the following:

1. General ledger and subsidiary ledgers used to account for (a) the receipt of CARES Act Fund payments and (b) the disbursements from such payments to meet eligible expenses related to the public health emergency due to COVID-19;
2. Budget records for 2019 and 2020;
3. Payroll, time records, human resource records to support costs incurred for payroll expenses related to addressing the public health emergency due to COVID-19;
4. Receipts of purchases made related to addressing the public health emergency due to COVID-19;
5. Contracts and subcontracts entered into using CARES Act Fund payments and all documents related to such contracts;
6. Grant agreements and grant subaward agreements entered into using CARES Act Fund payments and all documents related to such awards;
7. All documentation of reports, audits, and other monitoring of contractors, including subcontractors, and grant recipient and subrecipients;

8. All documentation supporting the performance outcomes of contracts, subcontracts, grant awards, and grant recipient subawards;
9. All internal and external email/electronic communications related to use of CARES Act Fund payments; and
10. All investigative files and inquiry reports involving CARES Act payments.

All CARES Act Fund documentation must be kept on file for seven (7) years after final payment. These record retention requirements are applicable to all prime recipients and their grantees and subgrant recipients, contractors, and other levels of government that received transfers of CARES Act Fund payments from prime recipients.

## **PROGRAM AND FISCAL MONITORING**

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In addition to record keeping, reporting, and auditing requirements of the CARES Act, use of CARES Act funding is subject to programmatic and fiscal auditing by the Los Angeles County Department of Public Health or the Office of the Auditor-Controller at any time. Substantial record keeping is required. Unqualified expenditures of CARES Act funds could subject grantee to paying back disallowed costs and/or suspension of the grant altogether. An entity may also end up in the high-risk category, which increases the risk of additional audits. It may even impact an organization's ability to receive future awards.