



Illinois Department of Commerce & Economic Opportunity

JB Pritzker, Governor

Local CURE: Claiming the Costs of Implementing CDC Guidance for Public Employees and within Public Spaces or Facilities

The Department of Commerce and Economic Opportunity (DCEO) is releasing this guidance following the August 21st release of updated guidance from the Centers for Disease Control (CDC) for [Operating Schools During COVID-19](#) and the July 22nd release of [Interim Guidance on Management of COVID-19 in Correctional and Detention Facilities](#).

The purpose of this document is to make clear the full range of costs a Local Government Unit (LGU) may incur in the pursuit of making courthouses, city halls, police stations, administrative buildings, public facilities, and even public spaces a safer environment during the COVID-19 public health emergency. With proper documentation, items outlined below can be reimbursed through the Department's Local Coronavirus Urgent Remediation Emergency (or Local CURE) Support Program.

***Please note*:**

- This document is not intended to convey a public health order or advise on public health best practices. It is intended to be a tool for identifying public health costs resulting from CDC Guidance and help Local Governments assign those costs as reimbursable items under *the Local Coronavirus Urgent Remediation Emergency (or Local CURE) Support Program*.
- A measure for determining if a cost is reimbursable under the Local Cure program is to apply the expenditure to the "Reimbursable Expenditure Test".
 - To use the test, a cost must first comply with nonexclusive lists of eligible & ineligible costs as defined by the Program which can be found on the [Local Cure webpage](#).

Reimbursable Expenditure Test

If "TRUE" can be answered for all the below, Local Cure funds may be used.
The expense is connected to the COVID 19 emergency.

1. The expense is "necessary".
2. The expense is not filling a short fall in government revenues.
3. The expense is not funded thru another budget line item, allotment or allocation, as of March 27, 2020.
4. The expense is not being reimbursed through a different emergency response program.
5. The expense wouldn't exist without COVID 19 OR would be for a "substantially different" purpose.
6. The expense was incurred between March 1, 2020 and December 30, 2020. "Incurred" means services were performed or goods were received by the local government between March 1, 2020 and December 30, 2020. Payment need not be made during this time but must be made before January 31, 2021.

Below are points made within CDC's guidance on maintaining and operating within healthy schools and detention facilities. The Local CURE program is ready to support local governments that deem it necessary to adopt such guidance through the course of business and within public buildings and public spaces.

Costs associated with administrative leave

- **Staying home when appropriate:** *actively encourage employees... who are sick or who have recently had close contact with a person with COVID-19 to stay home.*
 - If staff are sent home out of necessity and have no ability to work from home the cost of continuing to pay the individual is considered a *substantially different use* of funds¹.
 - The budgeted payroll cost of placing them on “administrative leave” is much different from paying them to do their job and with documentation can be claimed under Local CURE.
 - If staff are sent home to work remotely and the LGU deemed it *necessary* to incur the *unbudgeted* cost of the appropriate technology to permit the “work from home” status, with documentation this can be claimed under Local CURE.
 - LGUs must build a case for making such IT purchases. Be prepared to document the *necessity* of the cost and how it passes the *Reimbursable Expenditure Test*.

Costs associated with sanitization and installing touchless sinks

- **Hand hygiene:** *reinforce handwashing...if soap and water are not readily available, hand sanitizer that contains at least 60% alcohol can be used.*
 - The Department will assume hand soap is budgeted by a LGU and therefore cannot be claimed under the program. However, with documentation and justification on how the expenditure passes the reimbursable expenditure test, the following expenditures may be considered by LGU for reimbursement under Local CURE:
 - Installing touchless sinks in public facilities.
 - Installing hand sanitizer stations in public facilities or public spaces like bars, restaurants, and outdoor gathering spaces like a main street shopping area.

Costs associated with PPE, masks, and other protective or mitigation equipment & commodities

- **Face coverings or masks:** *reinforce use of cloth face coverings or masks. The use of cloth face coverings or masks is one of the many important mitigation strategies to help prevent the spread of COVID-19.*
 - Costs related to reinforcing the use of face coverings in public buildings and within the community can be covered by Local CURE. Examples include:
 - Purchasing media to communicate and reinforce mask wearing.
 - Printing signs in multiple languages and placing them in public buildings and public spaces.
 - Assigning public safety staff to reinforce face covering mandates.
 - Aside from reinforcing face coverings, costs related to the purchase of face coverings and PPE is widely accepted for reimbursement by Local CURE. Examples to consider include:
 - Supplying public health, public safety, and public employees working in hazardous conditions with face coverings and PPE.
 - Consider the shelf life for various purchasing options and determine what is necessary based on the public employee's risk level.

¹ As indicated in the US Treasury [FAQ](#)

- Implementing a public health program focusing on small business adoption of public health guidance. With proper documentation the LGU's costs related to supplying these businesses with necessary protective equipment can be covered by Local CURE.

Costs associated with increased cleaning costs

- **Cleaning and disinfection:** *clean and disinfect frequently touched surfaces...develop a schedule for increased frequency of routine cleaning.*
 - If LGUs develop new policies around cleaning and disinfecting, to the extent these policies have derived as *necessary actions in response to the public health emergency* – the cost to implement those policies can be reimbursed by Local CURE. For example:
 - The LGU renegotiates a contract with a janitorial service to provide daily cleanings of the courthouse. The same crew may have previously been scheduled for once per week cleanings, the additional costs should be claimed under Local CURE.

Costs associated with improving air quality

- **Ventilation:** *consider ventilation system upgrades or improvements and other steps to increase the delivery of clean air and dilute potential contaminants.*
 - The CDC advises immediate upgrades to improve outdoor air ventilation, increased total airflow, increase air filtration, use of portable high-efficiency particulate air (HEPA) fan/filtration systems, and use of properly installed ultraviolet germicidal irradiation (UVGI) to inactivate the virus when ventilation is not possible.
 - The Local CURE program may be used to reimburse costs related to ventilation when limited to what is “necessary” and due to the COVID-19 public health emergency.
 - The Department advises LGUs to only use qualified installers who will specifically follow CDC approved guidance as drafted by the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE).
 - A link to ASHRAE’s guidance on building operations during the COVID-19 pandemic can be found [here](#).
 - A link to ASHRAE’s additional guidance for schools & universities should be considered for adoption by LGUs, when necessary. This guidance can be found [here](#).

Costs associated with building or installing physical barriers

- **Physical Barriers and Guides:** *space seating at least 6 feet apart when feasible.*
 - If Local Governments incur costs to revamp floor plans in public building, including the purchase of barriers, guides & dividers, these costs may be claimed under Local CURE.
 - Local CURE even goes further by reimbursing the costs of “parklets” installed on public property to enable outdoor dining. See DCEO’s [FAQ](#) on this topic.
 - Local Governments may seek reimbursement from Local CURE for the installation of plexiglass barriers in spaces where social distancing is not possible.

Costs associated with building communication networks

- **Develop information-sharing systems with partners:** *identify points of contact in relevant state, local, tribal, and/or territorial public health departments before SARS-CoV-2 infections develop. Actively engage with the health department to understand in advance which entity has jurisdiction to implement public health control measures for COVID-19 in a particular correctional or detention facility.*
 - Costs incurred by LGUs to improve necessary lines of communication with partnering units of government and health departments may be claimed under Local CURE. An example of a cost could be:
 - A County government deemed it necessary to establish a communications portal to share COVID related information with partners and incur a licensing cost for the software to establish the portal. The establishment of the portal would not have occurred if not for COVID-19 and was not a budgeted item, making the cost eligible under Local CURE.