



## BROWARD OFFICE OF THE INSPECTOR GENERAL

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### MEMORANDUM

To: Honorable Michael Udine, Mayor, Broward County,  
and Members, Broward Board of County Commissioners

From: John W. Scott, Inspector General 

Date: June 24, 2022

Subject: **OIG Closing Memorandum Re: *Review of Broward County's Expenditure of CARES Act Funds***

### SUMMARY

The purpose of this memorandum is to report that the Broward Office of the Inspector General (OIG) has concluded its review into Broward County's expenditure of the funds that it received from the Coronavirus Aid, Relief, and Economic Security (CARES) Act. The OIG conducted this review to independently monitor the administration of the CARES Act funding that the United States Department of the Treasury (Treasury) allocated to Broward County through the Coronavirus Relief Fund (CRF).

The OIG's review found that the county spent its \$340,744,702.30 of CRF proceeds on Broward Sheriff's Office (BSO) public safety payroll expenditures in accordance with the law and guidance from Treasury.<sup>1</sup> Although we found that the county was in compliance, we did identify an inadvertent misspending of \$72,632.42 that the county subsequently corrected. Additionally, we discovered that CRF proceeds may have been used for personnel benefits that Treasury may not consider eligible. These expenditures consisted of approximately \$5,248,217.41 in other post-employment benefits (OPEB) for retired personnel, \$697,687.32 in special pay for current personnel, and an unquantifiable amount in payroll positions that may not directly support public safety employees (indirect positions). However, if they were deemed ineligible in the future, the county still has ample expenditures that it could use to cover any of these items. After reviewing these issues with county representatives, they notified the OIG that, in an abundance of caution,

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<sup>1</sup> The scope of our review was limited to where the county allocated its CRF proceeds and whether that allocation was allowable under the CARES Act and the Treasury guidance. The OIG does not have jurisdiction over officials or employees of the county's constitutional officers, such as the county sheriff. Broward County Charter Section 10.01.B.(1)(a). Thus, we did not review whether BSO used the CRF proceeds from the county on eligible public safety payroll expenditures accurately and appropriately. We solely sought to ensure that BSO invoiced the county for at least \$340,744,702.30 in eligible public safety payroll expenditures, the amount the county allotted to BSO in CRF funding.

the county will reclassify a sufficient amount of funding to cover these items, which could cure the potential issues we address in this memorandum.

The OIG reviewed several county records including but not limited to Coronavirus Disease 2019 (COVID-19) and CARES Act presentations, the BSO CARES personnel services costs spreadsheet, BSO invoices and related payments, journal entries, and the Port Everglades (port) schedule of non-allowable expenses. We also reviewed several BSO records, such as budget expense details, pay code queries for OPEB and special pay, and position control reports. We also examined guidance from Treasury and the Office of Florida Financial Education for Special Pay. Additionally, the OIG spoke with several county and BSO employees.

## **BACKGROUND**

### ***The CARES Act***

The CARES Act was signed into law on March 27, 2020, and was aimed at providing economic relief for those whom the COVID-19 pandemic negatively impacted. Specifically, section 5001(a) of the CARES Act amended the Social Security Act by adding section 601, which established the CRF and appropriated \$150 billion from Treasury for payments to states, tribal governments, and certain local governments.

For local governments, Section 601(d) of the CARES Act specified that payments from the CRF could only be used to cover costs that:

- (1) were necessary expenditures incurred due to the public health emergency with respect to COVID-19;
- (2) were not accounted for in the budget most recently approved for the local government, as of March 27, 2020, the date of the enactment; and
- (3) were incurred during the period that began on March 1, 2020, and ended on December 31, 2021.<sup>2</sup>

Treasury published guidance that set out its interpretation on the permissible use of CRF payments.<sup>3</sup>

Payments from the CRF could only cover costs that were not accounted for in the relevant local government's most recently approved budget as of March 27, 2020. To meet this requirement, according to the Treasury guidance, the cost either (a) could not lawfully be funded using a line item, allotment, or allocation within that budget, or (b) was for a substantially different use from any expected use of funds in such a line item, allotment, or allocation.

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<sup>2</sup> Section 1001 of Division N of the Consolidated Appropriations Act, 2021, amended section 601(d)(3) of the Social Security Act to extend the time period for governments to incur eligible costs from December 30, 2020, to December 31, 2021.

<sup>3</sup> Coronavirus Relief Fund for States, Tribal Governments, and Certain Eligible Local Governments, Department of the Treasury, Federal Register Vol. 86, No. 10, 4182, Notices, Friday, January 15, 2021.

Specifically, the guidance provided nonexclusive examples of eligible expenditures, which included: (1) medical expenses; (2) public health expenses; (3) payroll expenses for public safety, public health, health care, human services, and similar employees whose services were substantially dedicated to mitigating or responding to the COVID-19 public health emergency; (4) expenses of actions to facilitate compliance with COVID-19-related public health measures; (5) expenses associated with the provision of economic support in connection with the COVID-19 public health emergency; and (6) any other COVID-19 related expenses that were reasonably necessary to the function of government that satisfied the CRF's eligibility criteria.

Expenses that were not eligible included: (1) expenses for the state share of Medicaid; (2) damages covered by insurance; (3) payroll or benefits expenses for employees whose work duties were not substantially dedicated to mitigating or responding to the COVID-19 public health emergency; (4) expenses that were or will be reimbursed under any federal program, such as the reimbursement by the federal government pursuant to the CARES Act of contributions by states to state unemployment funds; (5) reimbursement to donors for donated items or services; (6) workforce bonuses other than hazard pay or overtime; (7) severance pay; and (8) legal settlements.

The guidance was clear that money from the fund was not intended to cover government payroll expenses generally. Instead, it was intended to help with increased expenses such as having to hire new personnel to assist with the government's COVID-19 response and to allow governments facing budget constraints to not have to lay off or furlough employees who would be needed to assist with the response.

In listing what it considered eligible CRF expenditures, within the category of substantially different uses, Treasury specifically included payroll and benefits expenses for public safety, public health, health care, human services, and similar employees whose services were substantially dedicated to responding to the COVID-19 public health emergency. For those who were considered substantially dedicated employees, the full amount of payroll and benefits expenses could be covered using CRF proceeds. For those employees who were not substantially dedicated to mitigating or responding to the COVID-19 emergency, their payroll and benefits expenses could not be covered in full by proceeds from the CRF. However, CRF proceeds could be used on an hourly basis for employees who used a portion of their time dedicated to mitigating or responding to the COVID-19 emergency. Treasury did not provide a definition of "substantially dedicated."

Nonetheless, having recognized the importance of public health and public safety workers to local government responses to the COVID-19 emergency, Treasury, as an administrative accommodation, allowed local governments to presume that public health and public safety employees met the substantially dedicated test (public safety presumption).<sup>4</sup> Therefore, any work that these employees performed was considered substantially different than the work accounted for in the most recently approved budget (as of March 27, 2020), and all costs of these employees could be covered from the CRF during the covered period.

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<sup>4</sup> This presumption stands unless the chief executive, or equivalent, of the relevant government determines otherwise.

The Treasury guidance specified that public safety employees included “sheriffs and deputy sheriffs, firefighters, emergency medical responders, correctional and detention officers, and those who directly support such employees such as dispatchers and supervisory personnel.” The OIG sought but Treasury did not provide further direction as to the meaning of “those who directly support such employees.”

Treasury also provided written guidance on what payroll costs could be covered using payments from the CRF. According to that guidance, covered payroll costs included certain hazard pay and overtime but not workforce bonuses. Even though payroll costs generally could be covered using proceeds from the CRF, proceeds could only be used for hazard pay when it was specifically related to COVID-19. Relatedly, hazard pay and overtime for employees who were not substantially dedicated to responding to COVID-19 could only be covered using payments from the CRF if that pay was specifically for COVID-19 related duties.

Benefits that were covered included but were not limited to “the costs of all types of leave (vacation, family-related, sick, military, bereavement, sabbatical, jury duty), employee insurance (health, life, dental, vision), retirement (pensions, 401(k)), unemployment benefit plans (federal and state), workers compensation insurance, and Federal Insurance Contributions Act (FICA) taxes (which includes Social Security and Medicare taxes).”

### ***The County’s Funding of BSO and Allocation of CRF Proceeds to BSO***

BSO operates independently from the county and has its own bank accounts and accounting system. BSO provides services to the Fort Lauderdale-Hollywood International Airport (airport), the port, certain municipalities, and other county areas throughout the region (regional services).<sup>5</sup> According to the county’s Director of the Office of Management and Budget (OMB Director), BSO acts as a contract provider to the airport, the port, and certain municipalities.<sup>6</sup> The county primarily funds BSO’s annual budget of nearly one billion dollars up front via monthly payments. Specifically, BSO bills the county approximately one-twelfth of its annual budget monthly. BSO then invoices the airport, port, and municipalities separately for their share of the annual budget on a monthly basis.<sup>7</sup> The port and contracted municipalities pay their monthly invoices directly to BSO, and BSO then reimburses the county for the port and municipalities’ shares of the county’s upfront payment to BSO. In contrast, the airport pays its BSO invoices directly to the county through an interfund transfer in the accounting system, thus reimbursing the county for its upfront payments to BSO.<sup>8</sup> At year end, BSO reconciles any differences between the budgeted expenditures that it billed monthly to the county and the actual expenditures. Any difference is paid back to the county.

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<sup>5</sup> BSO’s services to the “region” include detention, dispatch, regional law enforcement, and regional fire services, which we collectively refer to as “regional” in this memorandum.

<sup>6</sup> Revenues and expenditures at the airport and port are not accounted for in the county’s general fund, and instead are accounted for under two separate enterprise funds.

<sup>7</sup> The county did not utilize CRF proceeds on BSO’s services for municipalities. Therefore, we did not include them in the scope of our review.

<sup>8</sup> BSO invoices the airport based on actual expenditures rather than estimated expenditures.

On April 23, 2020, the Broward County Board of Commissioners (county commission) received \$340,744,702.30 of CRF proceeds from Treasury. On January 11, 2021, the county reported to the Treasury OIG, through the GrantSolutions portal,<sup>9</sup> that it expended all \$340,744,702.30 of the CRF proceeds as of December 31, 2020.<sup>10</sup> The county explained that it used the public safety presumption set out by Treasury and expended the entire award of CRF proceeds on BSO public safety payroll expenses between March 1, 2020, and December 31, 2020.<sup>11</sup>

**THE OIG’S REVIEW AND OBSERVATIONS**

The OIG sought to determine whether the county allocated its CRF proceeds to BSO in accordance with the CARES Act and the Treasury guidance.

The county’s OMB Director provided the OIG with the spreadsheet he used to detail the monthly public safety payroll that the county expended from March through December 2020 for (1) regional, (2) the airport, and (3) the port (BSO spreadsheet). The BSO spreadsheet further broke down each of these three funds into the following BSO departments: (1) law enforcement, (2) fire rescue, (3) detention,<sup>12</sup> and (4) dispatch. The OMB Director used the BSO spreadsheet to show that the county had sufficient public safety payroll expenditures to apply to the \$340,744,702.30 of CRF proceeds that the county received from Treasury. The county utilized public safety payroll expenditures from March through December 2020 as follows: \$304,844,771.18 for regional, \$20,184,064.73 for the airport, and \$15,715,866.39 for the port, for a total of \$340,744,702.30. The total expenditures for each category and subcategory are seen in OIG Table 1 below.

**OIG Table 1  
County’s Allocation of CRF Proceeds  
March 1, 2020 through December 31, 2020**

<b>FUND</b>	<b>LAW ENFORCEMENT</b>	<b>FIRE RESCUE</b>	<b>DETENTION</b>	<b>DISPATCH</b>	<b>TOTAL</b>
Regional	\$ 83,530,094.78	\$21,326,592.12	\$164,492,046.26	\$35,496,038.02	\$304,844,771.18
Airport	\$ 14,512,593.00	\$ 5,671,471.73	\$ -	\$ -	\$ 20,184,064.73
Port	\$ 8,947,043.02	\$ 6,768,823.37	\$ -	\$ -	\$ 15,715,866.39
<b>TOTAL</b>	<b>\$106,989,730.80</b>	<b>\$33,766,887.22</b>	<b>\$164,492,046.26</b>	<b>\$35,496,038.02</b>	<b>\$340,744,702.30</b>

<sup>9</sup> GrantSolutions is a grant and program management service provider under the U.S. Department of Health and Human Services (HHS) used to capture the use of CRF payments from recipients. The GrantSolutions portal was prepopulated with recipient data, including CRF payment amount(s), date(s), unique identification number, and contact information. The recipients of CRF proceeds were responsible for reporting on the uses of CRF payments through this portal. Retrieved on March 24, 2022, from <https://oig.treasury.gov/sites/oig/files/2021-04/OIG-CA-20-029R.pdf>.

<sup>10</sup> Allocating the CRF proceeds to public safety inherently freed up funds that were previously budgeted for this purpose. Concurrently, the county allocated these funds to itself and its respective municipalities to mitigate the impact from and respond to the COVID-19 public health emergency.

<sup>11</sup> The Treasury OIG required CRF recipients to report spending quarterly. The county expended its CRF proceeds in fiscal years 2020 and 2021.

<sup>12</sup> The BSO spreadsheet showed this line item as “Corrections and Rehab,” but the OIG will refer to this line item as “detention” in this memorandum.

The BSO spreadsheet was comprised of the public safety payroll portion of the monthly payments the county made to BSO for regional, the airport, and the port. As described above, BSO billed the county for regional, airport, and port services monthly based on one-twelfth of BSO's annual budget.

The OIG reviewed all invoices, payments, and journal entries that appeared on the BSO spreadsheet and verified that all amounts matched the amounts that the county paid BSO for its regional, port, and airport services, as documented on its invoices and payments.<sup>13</sup>

According to the OMB Director, from March 1, 2020, to December 31, 2020, which was the original period that the U.S. government allowed CRF proceeds to be utilized, the county had more BSO public safety payroll costs than CRF proceeds. In total, the BSO spreadsheet documented \$359,800,210.81 in BSO public safety payroll for this period.<sup>14</sup> This amounted to the county having \$19,055,508.51 more in eligible BSO public safety payroll expenditures to apply to the \$340,744,702.30 of CRF proceeds it received.

Although the OIG was able to verify that the amounts on the BSO spreadsheet matched the invoices and payments, we identified \$72,632.42 in ineligible expenditures that the county subsequently corrected. Additionally, we identified potential issues with the use of CRF proceeds in the amount of at least \$5,248,217.41 in OPEB, \$697,687.32 in special pay, and an unquantifiable amount of payroll for indirect positions at BSO, such as chaplains, mechanics, and analysts.<sup>15</sup> Nonetheless, we note that even if these amounts were to be deemed to be ineligible expenditures from CRF proceeds, the county still has \$19,055,508.51 more in eligible BSO public safety payroll expenditures to offset these amounts and rectify its accounting.

Furthermore, if the indirect positions were to be deemed ineligible beyond the \$19,055,508.51, the county could utilize eligible BSO payroll expenditures well into 2021 or could utilize eligible non-BSO COVID-19 expenditures, of which there were many. A simple solution, which Treasury allows, exists to fix any of these potential issues.<sup>16</sup>

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<sup>13</sup> Since the supporting documentation varied between the three public safety payroll expenditure accounting funds, the OIG tested the spending of each fund separately, as described in each respective section below.

<sup>14</sup> Since, in most instances, the BSO spreadsheet did not identify which portion of the \$359,800,210.81 in expenditures it utilized with CRF proceeds, the OIG reviewed the full \$359,800,210.81 of eligible expenditures presented in the spreadsheet.

<sup>15</sup> We could not easily identify a total for these indirect positions because BSO's summary reports were limited.

<sup>16</sup> On December 14, 2021, Treasury revised its guidance to reflect that a cost associated with a necessary expenditure incurred due to the COVID-19 pandemic is considered incurred by December 31, 2021, if the recipient has incurred an obligation with respect to such a cost by December 31, 2021. Recipients are required to expend their CRF proceeds to cover these obligations by September 30, 2022.

## ***The County's Public Safety Payroll Expenditures***

### **\$304,844,771.18 of Public Safety Payroll Expenditures for Regional Services Tied Out to Invoices and Payments**

The OIG verified that the county utilized \$304,844,771.18 of CRF proceeds for regional public safety payroll expenditures during the covered period.

The BSO spreadsheet divided the regional public safety payroll into four departments: (1) law enforcement, (2) fire rescue, (3) detention, and (4) dispatch. The BSO spreadsheet, as well as OIG Table 2 below, show that the county had \$320,548,124.84 of eligible regional public safety payroll costs between March and December 2020, to which it applied \$304,844,771.18 of CRF proceeds.

**OIG Table 2**  
**Regional Public Safety Payroll Drawn on CRF Proceeds**  
**March 1, 2020 through December 31, 2020<sup>17</sup>**

<b>REGIONAL</b>	<b>PUBLIC SAFETY PAYROLL PRESENTED</b>	<b>CRF PROCEEDS UTILIZED</b>	<b>UNUSED OR (EXCEEDED) AMOUNT</b>
<b>Law Enforcement</b>	\$ 88,482,921.69	\$ 83,530,094.78	\$ 4,952,826.91
<b>Fire Rescue</b>	\$ 21,230,384.53	\$ 21,326,592.12	\$ (96,207.59)
<b>Detention</b>	\$172,140,225.18	\$164,492,046.26	\$ 7,648,178.92
<b>Dispatch</b>	\$ 38,694,593.44	\$ 35,496,038.02	\$ 3,198,555.42
<b>TOTAL</b>	<b>\$320,548,124.84</b>	<b>\$304,844,771.18</b>	<b>\$15,703,353.66</b>

The OIG verified the \$320,548,124.84 of eligible regional expenditures by tracing the monthly amounts from the BSO spreadsheet to the invoices and payments. The amounts agreed without exception.<sup>18</sup>

We found that there were more eligible expenses than utilized expenses for all but one of the four regional departments, fire rescue. The BSO spreadsheet showed that, for fire rescue, the county utilized \$21,326,592.12 of CRF proceeds, which was \$96,207.59 more than the \$21,230,384.53 of payroll costs incurred between March and December 2020. This was the only line item that was overdrawn on the BSO spreadsheet.<sup>19</sup>

When the OIG inquired about the overdrawn line item, the county's OMB Director, who created the BSO spreadsheet, explained that the purpose of the spreadsheet was to show that the county had sufficient BSO public safety payroll to apply to the approximate \$340 million of CRF proceeds received. Since the county only reported

<sup>17</sup> The expenses presented in the BSO spreadsheet pertain to fiscal years 2020 and 2021. The overdrawn amount of \$96,207.59 is net of \$132,478.68 overdrawn in fiscal year 2020.

<sup>18</sup> The OIG traced the full \$320,548,124.84 since the BSO spreadsheet did not identify which \$304,844,711.18 of the population that it paid with CRF proceeds.

<sup>19</sup> The OIG observed that BSO returned \$1,130,565.48 for fire rescue in September 2020, which may have caused this line to be overdrawn by \$132,478.68 in fiscal year 2020.

one number for expenses incurred to Treasury, he looked at the expenses in total, rather than by department, since BSO is one department. He suggested that there may have been a timing issue with this line item since the spreadsheet spanned across two fiscal years. He suggested that he could fix the negative \$96,207.59 on the BSO spreadsheet by taking it from the unused amount of \$4,952,826.91 under “BSO Law Enforcement.”

We note that although the regional fire rescue line item was overdrawn by \$96,207.59, the BSO spreadsheet did have \$15,703,353.66 of eligible unused regional expenditures that the county could reallocate to correct the overdrawn amount. Therefore, the difference is immaterial, and the OMB Director’s suggestion can correct the accounting.

*\$20,184,064.73 of Public Safety Payroll Expenditures for Airport Services Tied Out to Invoices and Payments*

The OIG verified that the county utilized \$20,184,064.73 of CRF proceeds for public safety payroll expenditures at the airport during the covered period.

The BSO spreadsheet broke down the airport’s public safety payroll into two departments: (1) law enforcement and (2) fire rescue. Both the BSO spreadsheet and OIG Table 3 below show that the county used CRF proceeds to fund \$20,184,064.73 of the \$21,128,496.58 of the airport’s public safety expenditures submitted between March and December 2020.

**OIG Table 3  
County Funding to the Airport with CRF Proceeds  
March 1, 2020 through December 31, 2020<sup>20</sup>**

AIRPORT	PUBLIC SAFETY PAYROLL PRESENTED	CRF PROCEEDS UTILIZED	UNUSED AMOUNT
<b>Law Enforcement</b>	\$ 15,457,024.85	\$ 14,512,593.00	\$ 944,431.85
<b>Fire Rescue</b>	\$ 5,671,471.73	\$ 5,671,471.73	\$ -
<b>TOTAL</b>	<b>\$ 21,128,496.58</b>	<b>\$ 20,184,064.73</b>	<b>\$ 944,431.85</b>

The OIG reviewed all invoices, payments, and interfund transfers for the invoices listed on the BSO spreadsheet that the airport paid to BSO totaling \$21,128,496.58 for airport public safety payroll expenditures<sup>21</sup> and verified that the invoices were in fact for public safety payroll during the eligible period in compliance with the CARES Act.

<sup>20</sup> The BSO spreadsheet presented expenses that pertained to fiscal years 2020 and 2021. The county used CRF proceeds to fund all of the airport’s payroll expenditures that were presented during the eligible period in fiscal year 2020. Thus, the unused amount of \$944,431.85 in OIG Table 3 pertains to fiscal year 2021.

<sup>21</sup> The OIG notes that the BSO spreadsheet did not specify which \$20,184,064.73 of the eligible \$21,128,496.58 in payroll costs were paid utilizing CRF proceeds; therefore, the OIG verified that all \$21,128,496.58 of public safety payroll costs were eligible to be paid with CRF proceeds.

*\$15,715,866.39 of Public Safety Payroll Expenditures for Port Services Tied out to Invoices and Payments, But Some Were Ineligible and Later Rectified*

The OIG verified that the county utilized \$15,715,866.39 of CRF proceeds for public safety payroll expenditures at the port during the covered period.

The BSO spreadsheet broke down the port’s public safety payroll into two departments: (1) law enforcement and (2) fire rescue. Both the BSO spreadsheet and OIG Table 4 below show that the county used CRF proceeds to fund \$15,715,866.39 of the \$18,123,589.39 of the port’s public safety expenditures submitted between March and December 2020.<sup>22</sup>

**OIG Table 4**  
**County Funding to the Port with CRF Proceeds**  
**March 1, 2020 through December 31, 2020<sup>23</sup>**

PORT	PUBLIC SAFETY PAYROLL PRESENTED	CRF PROCEEDS UTILIZED	UNUSED AMOUNT
Law Enforcement	\$ 9,983,943.61	\$ 8,947,043.02	\$1,036,900.59
Fire Rescue	\$ 8,139,645.78	\$ 6,786,823.37	\$1,370,822.41
<b>TOTAL</b>	<b>\$ 18,123,589.39</b>	<b>\$ 15,715,866.39</b>	<b>\$2,407,723.00</b>

While the OIG determined that the county utilized \$15,715,866.39 of CRF proceeds to pay for public safety payroll expenditures at the port, we also found that \$72,632.42 of that amount was used inadvertently on ineligible expenditures.

The OIG verified the county’s public safety payroll expenditures at the port by vouching the respective expenditures to BSO invoices and the county’s proof of payment. While verifying the \$15,715,866.39 that the county paid for public safety payroll expenditures at the port, the OIG identified \$72,632.42 of expenditures that were not eligible to be paid from CRF proceeds because they were for non-CARES Act eligible expenditures, predated the covered period, or both. For example, these expenditures were for fuel and repairs and maintenance of BSO vessels from December 2018 through June 2020. Most of these expenditures predated the covered period, while others were not incurred due to the COVID-19 public health emergency. None of the \$72,632.42 was for public safety payroll.

Both the county OMB and the port’s Director of Finance agreed that these expenditures were not eligible to be paid from the CRF, and they sought a solution to rectify the ineligible expenditures. After reviewing the ineligible expenditures, the OMB

<sup>22</sup> The spreadsheet, however, did not specify which portion of the \$18,123,589.39 that it paid with CRF proceeds. Therefore, the OIG tested the full amount by tracing the monthly amounts to the respective invoices and payments without exception.

<sup>23</sup> The BSO spreadsheet presented expenses that pertained to fiscal years 2020 and 2021. The county used CRF proceeds to fund all of the port’s payroll expenditures presented during the eligible period in fiscal year 2020. Thus, the unused amount of \$2,407,723.00 in OIG Table 4 pertains to fiscal year 2021.

identified an additional \$79,708.44 in public safety overtime expenses for the port from fiscal year 2020 that the county had not previously utilized for CRF reporting purposes. Therefore, the county was able to remediate this finding without having to make any adjustments to prior fiscal years.

The OIG was ultimately able to verify that BSO invoices and payments supported the total \$340,744,702.30 in public safety payroll expenditures that the county asserted it made. That is, all amounts documented on the BSO spreadsheet matched the amounts that the county paid BSO per the respective invoices and payments. Once we completed that exercise, we delved deeper into some areas that we identified as potentially problematic.

***Potential Ineligible Charges Identified in the Review of BSO Invoices***

During its review, the OIG identified potential issues with the use of CRF proceeds for \$5,248,217.41 in OPEB and \$697,687.32 in special pay, as we detail below. We also noticed that the payroll expenses of many positions may not have qualified as eligible expenditures under the Treasury guidance, but, because of the lack of clear guidance in these areas, the OIG was unable to conclude that these charges were ineligible.

The OIG reviewed the relevant BSO invoices in order to obtain a reasonable assurance that the funds were only used for CARES Act-eligible expenditures. The OIG observed that BSO’s invoices to the airport included a detailed list of the various expense accounts that comprised the invoice total (see OIG Figure 1 below). As noted above, the airport pays BSO for the actual expenditures incurred, rather than a monthly allocation of BSO’s annual budget. Thus, the invoices that BSO sent to the airport contained more detail than the port or regional invoices.

**Payroll March 2020**

<b>Account</b>		<b>Airport DLE 23240</b>
512401	Regular Salary	864,335.50
512407	Cell Phone Supplement	600.08
514401	Overtime	123,182.78
515401	Special Pay	5,233.58
521401	FICA Taxes	74,794.15
522401	Retire / Regular	7,894.10
522402	Retire / Special Risk	186,023.55
522404	Retire / Drop Regular	2,083.47
522405	Retire / Drop Special Risk	15,183.16
523401	Life / Health Insurance	187,510.94
523403	OPEB	45,266.75
523406	RHSP	1,856.84
524401	Worker's Comp	34,807.00
	<b>Totals</b>	<b>1,548,771.90</b>

**OIG Figure 1: Excerpt from BSO invoice of \$1,548,771.90 for law enforcement services at the airport for March 2020 with detailed listing of payroll expenditures.**

As seen in the below examples, regional invoices (OIG Figure 2) and port invoices (OIG Figure 3) did not have a similar detailed breakdown of the various expenditures that comprise regular salary and wages.

ITEM	OBJ. CODES	TOTAL BUDGET (1)	PREVIOUSLY RECEIVED (2)	THIS REQUISITION (3)	TOTAL REQUISITION TO DATE (4)
<b>LAW ENFORCEMENT</b>					
10010-15502000					
Regular Salary & Wages	510030	\$ 102,500,840.00	\$ 42,708,683.35	\$ 8,541,736.67	\$ 51,250,420.02
Miscellaneous Expense	547160	\$ 15,562,778.00	\$ 6,479,422.03	\$ 1,297,622.27	\$ 7,777,044.30
Improv Other than Bldg	560020	\$ 50,000.00	\$ 50,000.00	\$ -	\$ 50,000.00
Communications Equipment	560360	\$ 225,770.00	\$ 225,770.00	\$ -	\$ 225,770.00
Building Improvements	560220	\$ 90,000.00	\$ 90,000.00	\$ -	\$ 90,000.00
Machine Equipm GT S1000	560310	\$ 885,484.00	\$ 885,484.00	\$ -	\$ 885,484.00
Vehicle Replacement	560330	\$ 124,386.00	\$ 124,386.00	\$ -	\$ 124,386.00
Furniture	560410	\$ 40,000.00	\$ 40,000.00	\$ -	\$ 40,000.00
Lease/Purchase Equipment	560360	\$ 60,000.00	\$ 60,000.00	\$ -	\$ 60,000.00
Computer Hardware	560370	\$ 127,270.00	\$ 127,270.00	\$ -	\$ 127,270.00
Computer Software	567010	\$ 43,320.00	\$ 43,320.00	\$ -	\$ 43,320.00
TO 10615 General Trust Fund	911015	\$ -	\$ -	\$ -	\$ -
Transfer to Fund 0250	9129	\$ -	\$ -	\$ -	\$ -
Reserve Sheriff	597070	\$ 600,000.00	\$ -	\$ -	\$ -
Reserve-OPEB	9479	\$ -	\$ -	\$ -	\$ -
SUBTOTAL		\$ 120,309,848.00	\$ 50,834,335.38	\$ 9,839,358.94	\$ 60,673,694.32

OIG Figure 2: Excerpt from BSO Requisition of \$8,541,736.67 for regional law enforcement services for March 2020 (highlighting added).

Line	Description	Quantity	UOM	Unit Amt	Net Amount
1	PORT EVERGLADES/POLICE March 2020	1	EA	1,168,901.50	1,168,901.50
				Subtotal:	1,168,901.50
				<b>AMOUNT DUE:</b>	<b>1,168,901.50</b>

OIG Figure 3: Excerpt from BSO invoice of \$1,168,901.50 for law enforcement services at the port for March 2020 (highlighting added).

After reviewing the detailed listing of expenses in the airport’s invoices, we began to evaluate those charges. BSO was able to provide the OIG with reports that enabled us to determine that BSO also included OPEB and special pay in the regional and port invoice totals. Additionally, upon reviewing the actual earnings by check date (payroll detail) that was included as part of the airport invoice, the OIG observed two positions that may or may not have directly supported public safety employees (indirect positions).<sup>24</sup> BSO was able to provide the OIG with reports that enabled us to review indirect positions for regional and the port. The OIG then questioned whether the county could use CRF proceeds to pay for the following charges: (1) OPEB; (2) special pay; and (3) indirect positions.

<sup>24</sup> As explained in the above section titled, “The CARES Act,” Treasury guidance stated that public safety employees for whose payroll CRF proceeds could be used included “sheriffs and deputy sheriffs, firefighters, emergency medical responders, correctional and detention officers, and those who directly support such employees such as dispatchers and supervisory personnel.” It did not further explain what it meant by “directly support.”

### Other Post-Employment Benefits

According to the National Association of State Retirement Administrators, OPEB refers to “the benefits, other than pensions, that a state or local government employee receives as part of his or her package of retirement benefits. Typically, retiree medical insurance is the most significant OPEB offering, though other benefits such as life insurance are also covered by this umbrella term.”<sup>25</sup>

The Treasury guidance provided that covered benefits of employees substantially dedicated to mitigating or responding to COVID-19 “include, but are not limited to, the costs of all types of leave (vacation, family-related, sick, military, bereavement, sabbatical, jury duty), employee insurance (health, life, dental, vision), retirement (pensions, 401(k)), unemployment benefit plans (federal and state), workers compensation insurance, and Federal Insurance Contributions Act (FICA) taxes (which includes Social Security and Medicare taxes).”<sup>26</sup> The guidance also provided that payroll or benefits expenses of employees whose duties were not substantially dedicated to mitigating or responding to the COVID-19 pandemic were not eligible expenditures of CRF proceeds; this indicated to us that eligible payroll costs related only to current employees who were responding to the pandemic—not retirees. The guidance did not specifically address OPEB.

The OIG examined the BSO invoices and identified approximately \$5,248,217.41 in OPEB charges for regional, the airport, and the port from March to December 2020.<sup>27</sup> BSO’s OMB Director confirmed that these charges were included in BSO’s invoices to regional, the port, and the airport as part of the invoice total. After reviewing these charges and comparing them to the guidance, the OIG determined that these charges may be ineligible under the CARES Act because these OPEB expenditures were for retired employees and not “employees whose services are substantially dedicated to mitigating or responding to the COVID-19 public health emergency.”

The OIG asked both the county and BSO about whether OPEB qualified as an eligible benefit for application of CRF proceeds, and each gave a different opinion. According to BSO, the \$5,248,217.41 in OPEB charges were post-employment benefits paid for *retired* employees (emphasis added). The OIG observed that none of the 57 individuals named on the detailed listing of OPEB expenditures included in the March 2020 BSO airport law enforcement invoice appeared on the respective payroll detail. Furthermore, BSO’s description states, “OPEB Chg *retiree* DLE March 2020” (emphasis added). In conversations with the OIG, both BSO’s Comptroller and OMB Director stated that they did not think CRF proceeds should be utilized for OPEB charges.

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<sup>25</sup> Retrieved on May 16, 2022, from <https://www.nasra.org/opeb>.

<sup>26</sup> Coronavirus Relief Fund for States, Tribal Governments, and Certain Eligible Local Governments, Department of the Treasury, Federal Register Vol. 86, No. 10, 4182, 4186, Notices, Friday, January 15, 2021.

<sup>27</sup> The OIG used BSO’s pay code query to calculate the amount that BSO billed regional and the port for OPEB. However, since BSO’s airport invoices contained a detailed listing of OPEB charges by retiree, the OIG used the OPEB charges from the invoices for the airport.

The county opined that OPEB costs may be covered under the CARES Act, relying on language in the Treasury guidance that “all costs of such employees” may be covered and the fact that the list of “covered benefits” is not an exhaustive list. The county stated, “OPEB costs are a normal, recurring, collectively bargained cost of employees of BSO. OPEB are earned benefits that are no different than retirement benefits and Social Security and Medicare taxes that are specifically mentioned in the U.S. Treasury Guidance. As such, it is a reasonable interpretation that OPEB costs may be covered.”<sup>28</sup> Additionally, the county stated that since the Treasury guidance on the American Rescue Plan Act (ARPA) does not prohibit recipients from funding OPEB, and since there are similarities between the use of public safety payroll expenses in both ARPA and CARES, they do not believe there is any reason to conclude that OPEB is not a covered benefit under the CARES Act.

Although the OIG understands the county’s position on OPEB, we believe the county is referring to funding an OPEB account for current employees, while the \$5,248,217.41 we are referring to is actual payments for retired employees who thus were not responding to the pandemic. The guidance stated that “[p]ayroll or benefits expenses for employees whose work duties are not substantially dedicated to mitigating or responding to the COVID-19 public health emergency” were not eligible expenditures, and it is clear that retired employees who received OPEB benefits were not substantially dedicated to mitigating or responding to the pandemic.

Therefore, unless Treasury specifies that OPEB payments for retirees are allowable expenditures, the OIG cannot conclude that they are.

Regardless, the county has more than enough eligible expenditures even if OPEB were deemed ineligible, and county management has since told us that, even though they believed OPEB was an eligible expenditure, in an abundance of caution, they would reclassify sufficient expenditures to cover these costs.

### Special Pay

The Treasury guidance provided that covered payroll costs included “certain hazard pay and overtime, but not workforce bonuses.” It did not provide a definition for “workforce bonuses.”

The OIG sought to determine what exactly the “special pay” line item (as seen in OIG Figure 1 above) covered to see whether it was an eligible payroll cost under the CARES Act. We spoke to BSO’s OMB Director, who explained that special pay is a salary supplement required by the State of Florida. She provided guidance from the Office of Florida Financial Education that stated, “The Criminal Justice Incentive Program (CJIP) is designed to give a supplemental salary payment to law enforcement and correctional officers to reward educational and other career development activities that

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<sup>28</sup> Letter from Assistant County Administrator, Re: Office of the Inspector General (OIG) Review of County Receipt of Funding under Federal Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020, dated April 29, 2022.

go beyond minimum position requirements. CJIP is paid as a supplemental payment that must be setup in People First as a recurring payment.” Thus, special pay was not hazard pay or overtime pay. Rather, it was an incentive payment to reward educational and other career development activities that went beyond minimum position requirements.

The OIG examined BSO reports and was able to approximate that BSO charged regional, the port, and the airport a total of \$697,687.32 for special pay charges from March through December 2020. BSO’s OMB Director informed the OIG that special pay was included as a part of the pension calculation, that is, it was pensionable for BSO employees and thus, although not certain, she believed that special pay was an eligible expenditure under the CARES Act.

The county took a similar position to BSO, reasoning that special pay was an eligible cost under the CARES Act because incentive pay was distinguishable from bonuses for pension purposes. Furthermore, the county claimed that educational and other incentive pays are not bonuses, stating, “Generally, incentive pays are known in advance and are recurring payments required by collective bargaining agreement, contract, or policy (or in this case, law) for future work performed, while bonuses are not necessarily known and are discretionary payments that are non-recurring for worked [sic] performed or a project or task completed in the past. Often incentive pays are added to base salary as the incentive and bonuses are paid as a lump sum.” The county finally stated that since there is a state statute requiring the payment of the educational incentive, which makes it a recurring cost of employment, it is clearly a component of “all costs” of the employee.

As the Treasury guidance does not define “workforce bonuses,” the OIG was unable to determine whether special pay was an eligible expenditure under the CARES Act. Rather, we pointed this out as a potential issue and noted that the county had additional eligible expenditures available to substitute if the special pay expenditures are deemed ineligible in the future. After discussing this issue with an Assistant County Administrator and the OMB Director, they explained that, even though they believed special pay was an eligible expenditure, in an abundance of caution, the county would reclassify sufficient expenditures to cover these costs.

### Indirect Positions

For the administrative accommodation for public safety employees described above, Treasury supplemented its guidance to clarify which employees were within the scope of the accommodation. According to that guidance, public safety employees includes “sheriffs and deputy sheriffs, firefighters, emergency medical responders, correctional and detention officers, *and those who directly support such employees* such as dispatchers and supervisory personnel” (emphasis added).

The OIG reviewed airport invoices and identified non-law enforcement positions such as “Admin Specialist I” and “Admin Specialist II.”<sup>29</sup> After reviewing these positions along with the guidance, the OIG determined that these charges may not have been eligible to be paid with CRF proceeds.

BSO’s Comptroller advised that these administrative specialists are secretarial positions that support staff in the field. She added that administrative specialists are “definitely essential to law enforcement at the airport.” Some of the administrative staff’s job functions include communicating with command, processing payroll, preparing the budget, and ordering supplies. She concluded that she believed the payroll for these positions qualified as CARES Act eligible expenditures.

The county agreed with BSO that all employees directly supported public safety and that BSO employee payroll may be covered for the example classifications given in the guidance (deputy sheriffs, firefighters, correction personnel, etc.) and those that directly support them, as both groups are considered “public safety employees” under the guidance.

The OIG reached out to the Treasury OIG twice in March 2022 to get clarification on who is deemed to “directly support such employees.” Although the Treasury OIG acknowledged our request for additional information, we have yet to receive a substantive response. As the guidance does not provide a definition of those who “directly support such employees,” the OIG cannot make a determination as to whether the payroll costs of these positions qualify as eligible expenditures under the CARES Act. Furthermore, because we have no guidance as to which positions qualify and which positions do not qualify, we were unable to quantify the potential ineligible expenditures. We noted to the county that if these positions were deemed ineligible expenditures and accounted for more than the unused BSO payroll expenditures through December 2020, the county could still utilize BSO payroll expenditures through December 2021 or could use eligible non-BSO payroll expenditures, such as the cost to run COVID vaccination or testing sites. Again, after discussing this issue with the county, its representatives explained that even though they believed that the costs for these positions qualified as eligible expenditures, in an abundance of caution, they would reclassify sufficient expenditures to cover them.

### ***The County’s \$151,231.32 of Interest on CRF Proceeds Was Spent Per Guidance***

Incidental to our main objective of determining whether the county properly applied CRF proceeds, we observed whether the county properly handled the interest it received from those proceeds. Recipients of CRF proceeds may deposit CRF payments into separate interest-bearing accounts; however, if recipients separately invested amounts they received from the CRF, they still must use the interest earned or other proceeds of these investments to cover expenditures

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<sup>29</sup> BSO later sent the OIG a list of all positions for the departments relevant to the BSO spreadsheet. The OIG noted other non-law enforcement positions including chaplains, mechanics, analysts, techs, and specialists.

incurred on eligible expenses in accordance with section 601(d) of the Social Security Act and Treasury's guidance.<sup>30</sup>

Initially, the county recorded its \$340,744,702.30 of CRF proceeds in its PeopleSoft financial administration platform and deposited all of it into a money market interest bearing account. The county earned a total of \$151,231.32 in interest from the CRF proceeds. The Director of Accounting advised that the county used all the earned interest on the county's vaccination program.

These earnings are not reflected in its quarterly reports to the Treasury OIG because the GrantSolutions portal does not allow users to modify the amount rewarded for interest earnings.<sup>31</sup> Rather, the CRF recipient was responsible for tracking the interest earned and expended separately. Because the county could not report the interest earned and expended to the Treasury OIG, in July 2021, it completed all its quarterly financial reporting to the Treasury OIG for its CRF proceeds. The OIG verified that by December 31, 2021, the county used the \$151,231.32 of interest earned for expenditures related to the county's vaccination program in accordance with the Treasury guidance.

## **COUNTY RESPONSE**

On April 21, 2022, the OIG met with an Assistant County Administrator and the OMB Director to present our general findings. During that meeting, we affirmed that the county's spending of \$340,744,702.30 of CRF proceeds on BSO public safety payroll expenditures was in accordance with the law and Treasury guidance. However, we also presented the potential issues we found related to OPEB, special pay, and indirect positions, and sought any clarification they could offer on these matters. The response at that meeting was that OPEB, special pay, and administrative support positions<sup>32</sup> were all eligible expenditures under the CARES Act. On April 29, 2022, the Assistant County Administrator sent the OIG a follow-up letter detailing the county's positions on these issues as discussed above. (OIG Appendix A) While the county representatives disagreed that any of these expenditures were ineligible, in an abundance of caution and to avoid any issues that the OIG raised, they wrote that the county would reclassify a sufficient amount of funding to cover OPEB, special pay, and administrative support positions.

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<sup>30</sup> Coronavirus Relief Fund for States, Tribal Governments, and Certain Eligible Local Governments, Department of the Treasury, Federal Register Vol. 86, No. 10, 4182, 4193-94, Notices, Friday, January 15, 2021.

<sup>31</sup> The county has not been able to report the interest earnings through the GrantSolutions portal in accordance with the Treasury OIG Guidance because the portal did not allow users to modify the award amount for interest earned. Instead, the CRF recipient was responsible for tracking the interest earned and expended separately. According to the county's Director of Accounting, the county had discussions with the Treasury OIG about the inability to report interest on the GrantSolutions portal and they instructed the county's Finance Supervisor to indicate that the financial reporting was complete at that time, despite not having expended the interest earned. The county could not subsequently report on the portal the use of those interest earnings on the vaccination program because there was no ability to report the interest earnings or spending above the allocated amount of financial assistance in the portal.

<sup>32</sup> This is what the OIG refers to as "indirect positions" throughout this report.

## CONCLUSION

The OIG has concluded its review into the county's expenditure of its \$340,744,702.30 of CRF proceeds that it received from the CARES Act. This review was conducted to independently monitor the administration of the CARES Act funding that Treasury allocated to Broward County.

The OIG's review found that the county spent its \$340,744,702.30 of CRF proceeds on BSO public safety payroll expenditures in accordance with the law and guidance from Treasury. Although we found that the county complied with the law and guidance, we did identify an inadvertent misspending of \$72,632.42 that the county subsequently corrected. Additionally, we discovered some potential issues with the use of CRF proceeds for approximately \$5,248,217.41 in OPEB, \$697,687.32 in special pay, and an unquantifiable amount in indirect positions. We noted, however, that regardless of whether the federal government ever questions the county on these issues, the county still has ample expenditures that it could use to cover any of these items that could potentially be deemed ineligible in the future.

The county notified the OIG that, in an abundance of caution, it will reclassify a sufficient amount of funding to cover OPEB, special pay, and administrative support positions because sufficient BSO payroll expenses remain unused.<sup>33</sup> If done properly, this could cure any of the potential issues addressed in this memorandum.

We thank the county for its cooperation during our review and appreciate management's efforts to properly steward these public funds.

cc: Monica Cepero, County Administrator  
Andrew Meyers, County Attorney  
Gregory Tony, County Sheriff

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<sup>33</sup> The OIG also noted to the county that it accounts for the airport and port in separate funds and that the BSO spreadsheet and the county's accounting records showed that CRF proceeds ultimately paid all BSO payroll expenditures in these funds within the eligible period for fiscal year 2020. Therefore, adjusting potentially disallowed expenditures such as OPEB could require the county to make fiscal year adjustments in the fund's accounting records.

**OIG 20-005-M**

# **APPENDIX A**



KEVIN B. KELLEHER, Assistant County Administrator

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April 29, 2022

**Via Email:** [rali@broward.org](mailto:rali@broward.org) and [rinelson@broward.org](mailto:rinelson@broward.org)

Riad Ali, Director, Audit and Contract/Procurement Oversight

Richard W. Nelson, Senior Auditor

Broward Office of the Inspector General

One North University Drive, Suite 111

Plantation, Florida 33324

**RE:** Office of Inspector General (OIG) Review of County Receipt of Funding under Federal Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020

Dear Messrs. Ali and Nelson:

This is a follow-up to our meeting on April 21, 2022, wherein we discussed the above referenced review being conducted by the OIG's Office. Present at that meeting were: Special Agent Hisae Tanaka, Senior Assistant Legal Counsel Jenna Gargano, and yourselves from OIG, and Director of Office and Management and Budget Norm Foster and myself from Broward County.

The County appreciates the OIG's review of CARES funding received by Broward County and the conclusion that no issues exist with respect to the County's receipt and use of CARES funds, as indicated at the meeting.

At that meeting, the OIG was seeking the County's clarification on three items to finalize your report as the OIG did not feel they were adequately addressed in the CARES Act or in the Coronavirus Relief Fund Guidance issued by the U.S. Department of Treasury (U.S. Treasury CARES Guidance). Specifically, the OIG was looking for clarification on the following: (1) Other Post-Employment Benefits; (2) Special Pay Component of Payroll Costs; and (3) the Inclusion of Administrative Staff Salaries. Below is the County's clarification on each of these items:

### **1. Other Post-Employment Benefits (OPEB)**

Broward County appropriates funding for the Broward County Sheriff's Office (BSO) for all salary and benefit costs, which includes costs for other post-employment benefits. While not specifically itemized, these benefits are part of the costs for employees to ensure that their future benefits are properly funded.

The U.S Treasury CARES Guidance (issued January 15, 2021) provides on page 4185 that:

Treasury has provided, as an administrative accommodation, that a ...local...government may presume that ... public safety employees meet the substantially dedicated test, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise. ...**All costs of such employees** [emphasis added] may be covered using payments from the Fund for services provided during the period that begins on March 1, 2020, and ends on December 31, 2021. [**emphasis added**]

The U.S. Treasury CARES Guidance further states on page 4186 that:

Covered benefits include, **but are not limited to** (emphasis added), the costs of all types of leave (vacation, family-related, sick, military, bereavement, sabbatical, jury duty), employee insurance (health, life, dental, vision), retirement (pensions, 401(k)), unemployment benefit plans (federal and state), workers compensation insurance, and Federal Insurance Contributions Act (FICA) taxes (which includes Social Security and Medicare taxes).” [**emphasis added**]

The U.S. Treasury CARES Guidance is clear that all costs of such employees, including benefits, may be covered. The U.S. Treasury CARES Guidance is equally clear that the list of “covered benefits” is NOT an exhaustive list of costs, as the words “but are not limited to” make clear. OPEB costs are a normal, recurring, collectively bargained cost of employees of BSO. OPEB are earned benefits that are no different than retirement benefits and Social Security and Medicare taxes that are specifically mentioned in the U.S. Treasury Guidance. As such, it is a reasonable interpretation that OPEB costs may be covered.

In further support of this contention, the U.S. Department of Treasury issued guidance on funding under the American Rescue Plan Act of 2021 (U.S. Treasury ARPA Guidance), a subsequently issued Act providing funding in response to the coronavirus pandemic, that has further given specific guidance on the specific issue of OPEB with respect to public safety payroll costs.

The U.S. Treasury ARPA Guidance (issued January 2022) states in relevant part:

The U.S. “Treasury has determined that Sections 602(c)(2)(B) and 603(c)(2), which refer only to pensions, do not prohibit CSFRF/CLFRF recipients from funding OPEB.” [Answer to Question 8.2 on page 34 of <https://home.treasury.gov/system/files/136/SLFRPFAQ.pdf>].

Moreover, the Treasury notes that “In general, if an employee’s wages and salaries are an eligible use of Fiscal Recovery Funds, recipients may treat the employee’s covered benefits as an eligible use of Fiscal Recovery Funds” [Answer to Question 8.1 on page 34 of <https://home.treasury.gov/system/files/136/SLFRPFAQ.pdf>]

Given the similarities between the use of public safety payroll expenses (payroll and covered benefits) in both CARES and the subsequently enacted ARPA, there is no reason to conclude that OPEB is not a “covered benefit” with respect to CARES Act especially since the CARES Act definition specifically included language that it was not limited (i.e., “include, but are not limited to”).

As such, it is the County’s position that OPEB costs may be covered under CARES Act. This position is supported by the guidance from the U.S. Department of Treasury.

## 2. Special Pay Component of Payroll Costs of BSO

The next clarification requested is on salary incentives that are denoted in BSO’s payroll system as “Special Pay”. As discussed at the meeting, BSO has indicated that the vast majority of the “Special Pay” is for education incentives required by Florida law and not a “bonus”.

Section 943.22 of Florida Statutes states in relevant part:

### **943.22 Salary incentive program for full-time officers.—**

...(2)(a) A basic salary incentive shall be paid to any law enforcement officer who was entitled to such payment under this paragraph as it existed immediately prior to October 1, 1984.

(b) Any full-time officer who has a community college degree or equivalent shall receive the sum of \$30 per month in the manner provided for in paragraph (h).

(c) Any full-time officer who receives a bachelor’s degree shall receive an additional sum of \$50 per month in the manner provided for in paragraph (h).

(d) ... On or after July 1, 1985, any officer who completes a combination of 480 hours of approved advanced and career development training courses established pursuant to s. [943.17](#)(1)(b) and (c) shall receive the sum of \$120 per month...

(e) The maximum aggregate amount which any full-time officer may receive under this section is \$130 per month...

(j) The ***employing agency shall be responsible for the correct salary incentive payment*** to full-time officers. [***Emphasis added***]

Educational and other incentive pays (such as certification pay, assignment pay, shift differentials, etc.) are not “bonuses”. Generally, incentive pays are known in advance and are recurring payments required by collective bargaining agreement, contract, or policy (or in this case, law) for future work performed, while bonuses are not necessarily known and are discretionary payments that are non-recurring for worked performed or a project or task completed in the past. Often incentive pays are added to base salary as the incentive and bonuses are paid as a lump sum.

Incentive pays are also distinguished from bonuses for pension purposes. For example, under the Florida Retirement System (FRS) incentive pays, such as educational incentives, that are added to the base are considered as “compensation” for the purposes of calculating “average final compensation” while “bonuses” are not.

While these general distinctions are important in understanding the differences between “incentives” and “bonuses”, the existence of a state statute that requires the payment of the educational incentive clearly makes them a recurring “cost” of employment.

Again, the U.S Treasury CARES Guidance (issued January 15, 2021) provides on page 4185 that:

Treasury has provided, as an administrative accommodation, that a ...local...government may presume that ... public safety employees meet the substantially dedicated test, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise. ...**All costs of such employees** [emphasis added] may be covered using payments from the Fund for services provided during the period that begins on March 1, 2020, and ends on December 31, 2021. [**emphasis added**]

The guidance is clear: all costs of such employees may be covered. State-mandated salary incentives and other required and recurring incentives are clearly a component of “all costs” of such employees.

### **3. Administrative Support Positions**

The payroll for all the BSO positions used by the County are covered under the CARES Act as “public safety employees”. The U.S. Treasury CARES Guidance provides that that public safety employees covered includes those who directly support public safety employees. Specifically, the U.S. Treasury CARES Guidance states

In response to questions regarding which employees are within the scope of this accommodation, Treasury is supplementing this guidance to clarify that public safety employees **would include** police officers (including state police officers), sheriffs and deputy sheriffs, firefighters, emergency medical responders, correctional and detention officers, and **those who directly support such employees** such as dispatchers and supervisory personnel. [**emphasis added**]

The U.S. Treasury CARES Guidance provides that support staff are included in the definition of “public safety employees” and gives some examples (hence the use of “such as”). While the roles of “dispatchers and supervisory personnel” were given as examples, they were not intended to be the only roles, hence the use of the phrase “such as” rather than the use of the phrase “would include” used earlier in the section.

As discussed at the meeting, BSO has indicated that as an agency solely dedicated to public safety, all employees are directly supporting public safety. The County concurs with BSO’s view in this regard. At our meeting, the OIG indicated that clarification was requested of Treasury, but did not receive a response. In the absence of more specific guidance regarding which staff are not in direct support of the example classifications, it is reasonable to consider that the BSO employee payroll submitted may be covered for

the example classifications (deputy sheriff, firefighters, correction personnel, etc) and those that directly support them as both groups are considered “public safety employees” under the U.S. Treasury CARES Guidance.

### **Independent Reviews**

It is important to note that the County, in an effort to promote full transparency, had a licensed, independent external auditor, RSM US LLP (RSM), review its receipt and use of CARES Act funding. RSM confirmed that the County’s use was consistent with the CARES Act and the U.S. Treasury CARES Guidance. That opinion was previously provided to the OIG and is attached again as Attachment 1 for your convenience.

Additionally, the County’s expenditures under CARES Act were also reviewed by the County Auditor’s Office, which concluded that “the County’s reported use of CARES Act funding was in accordance with Treasury requirements and supported by sufficient and allowable expenditures.” The Office of the County Auditor’s Review dated May 10, 2021 was acknowledged and filed by the Board of County Commissioners at its June 1, 2021 meeting (Item No. 54). See [Broward County - File #: 21-945 \(legistar.com\)](#).

### **Conclusion**

As discussed herein, the County’s receipt and use of CARES Act funding was in accordance with the U.S. Treasury CARES Guidance. Furthermore, the County’s receipt and use of CARES Act funding was reviewed, at the County’s request, by a licensed, independent external auditor, RSM, and the Office of the County Auditor. Both reviews confirmed that the County’s receipt and use was consistent with the U.S. Treasury CARES Guidance.

Notwithstanding, and in an abundance of caution to avoid any issues raised by the OIG, the County will reclassify a sufficient amount of funding to cover OPEB, Special Pay, and Administrative Support Positions. As indicated by the OIG, the County has sufficient BSO payroll expenses that was not claimed.

Specifically, the U.S. Treasury CARES Guidance allows substitution of expenditures for any disallowed expenditure. Question 86 to the *Department of the Treasury Office of Inspector General Coronavirus Relief Fund Frequently Asked Questions Related to Reporting and Recordkeeping* indicates that if expenditures are determined to be unallowable, the prime recipient may demonstrate other expenditures would qualify as allowable (<https://oig.treasury.gov/sites/oig/files/2021-03/OIG-CA-20-028R.pdf> March 2, 2021).

As you know, all expenditures of CARES Act funds were reported as an expenditure of the County CARES Act fund and no other fund such as an Enterprise fund. In the event of any potential disallowance of expenditures in the CARES Act, the County will attribute additional allowable General Fund Public Safety costs to the CARES Act Fund. As

suggested by the OIG, this would resolve any issues of potentially disallowed expenditures for OPEB, Special Pay, and Administrative Support positions and amounts reported in the previously issued financial statements for each fund would remain unchanged.

### **Request for Additional Information**

At the meeting, the IG's Office also requested additional information and supporting documentation. Below is the list of requested information, much of which had been previously provided, and the County's response:

1. *What is the amount of money spent by County for municipal COVID related assistance?* – The municipal expenses related to COVID reimbursed by the Broward County, as reported in the County's Peoplesoft system as of April 21, 2022, totals \$69,121,102 (rounded to the nearest dollar). This is the same amount reported to the OIG in an email dated January 13, 2022 from the County's Director of Management and Budget Norman Foster. (See Attachment 2).
2. *What is the amount of CARES money that was unspent?* – As indicated in our meeting, and confirmed by the licensed, independent auditor, RSM, and the Office of the County Auditor, in their May 10, 2021 Report, the County's reported use of CARES Act funding was in accordance with Treasury requirements and supported by sufficient and allowable expenditures. As such, the amount unspent is zero as all CARES funds have been expended consistent with U.S. Treasury CARES Guidance.
3. *What was the interest earned on CARES Act fund used for and the supporting documents?* - The interest earned was spent on vaccination programs specifically approved by the Commission on 12/14/2021. This information and the voluminous supporting documents were provided to the OIG in an e-mail dated March 30, 2022 from the County's Accounting Director William O'Reilly. (See Attachment 3 for a copy of Mr. O'Reilly's March 30, 2022 email. If you need the voluminous supporting documents again, please let us know.)
4. *Has any of the remaining BSO funding for FY2021 been used to support a granting of other federal assistance?* – As indicated in the County's Schedule of Revenues, Expenditures and Changes in Fund Balance – General Fund for Year Ended September 30, 2021 (See Attachment 4), the actual expenditures for BSO for the fiscal year ending September 30, 2021 was \$967,065,133, even excluding monies expended for contract cities, the amount far exceeds the approximate \$340 million received for CARES Act. The County has not utilized any other Federal assistance for the remaining balance of BSO expenditures for FY2021
5. *Provide copies of ACH payments for Port Overtime* – The County received three invoices with costs related to overtime at Port Everglades, that were paid with two

Vouchers (Attachment 5 – Invoice dated December 15, 2020 and Attachment 6 - invoices dated September 25, 2020 and October 9, 2020). Below is detail on each Voucher payment:

First payment to BSO was Voucher ID 00638350, 12/21/20, totaling \$2,494,940.06. This payment included \$18,587.77 for Port Law enforcement overtime, and \$25,546.89 for Port Fire overtime (see Attachment 5 dated December 15, 2020).

Second payment to BSO was Vouchers ID 00646994 3/4/2021, \$44,765,697.00 and ID 00659203 3/9/2021, \$230,263.00. These vouchers total \$44,995,960.

The \$44,995,960 was approved by the County Commission on December 8, 2020 (Item 32). See <https://broward.legistar.com/View.ashx?M=F&ID=8940295&GUID=36FD78B4-36A7-4273-A298-0D9F0A623149> Page 2, line 3 of Exhibit 1 provides: “560BCN - Building and Construction \$44,995,960.00”

The Summary Explanation/Background of the item includes the breakdown of the \$44,995,960:

“In addition, \$45.0 million is reappropriated for the construction of a BSO Tactical Training Center and Parking Garage Facility. Of this amount, \$33.2 million was transferred from the BSO Reserve for Future Capital Outlay by the Commission in September 2019 and is reappropriated for the same purpose in Fiscal Year 2021; \$9.2 million is a reimbursement from the County to BSO for COVID-19 related expenses including **overtime**, personal protective equipment, sick time, and medical testing; and \$2.7 million is from the BSO reserve for capital expenses in Fiscal Year 20. These funds will be transferred to BSO in accordance with the terms of a Memorandum of Understanding between the County and BSO.” **[Emphasis added]**

Included in the \$9.2 million of reimbursements from the County to BSO for COVID-19 related expenses including **overtime**, personal protective equipment, sick time, and medical testing was overtime at the Port.

This payment included:

- (1) \$9,173.95 for Port Law enforcement overtime, and \$16,359.43 for Port Fire overtime (see Attachment 6 invoice dated September 25, 2020); and
- (2) \$10,040.40 for Port Law enforcement overtime (see Attachment 6 invoice dated October 9, 2020).

As we hope the foregoing demonstrates, the County has been open and transparent about the receipt and use of CARES Act funds and have operated consistent with the U.S. Treasury CARES Guidance. In light of the significant amount of money received and our continual desire to be good stewards of public funds we are entrusted with, the County took extra steps, including a review by a licensed, independent auditor, to ensure that we were compliant.

We understand the OIG's need to review the County's action due to the significant amount of public funds, and trust that the clarifications and additional information provided herein further support the OIG's conclusion, as stated at our meeting, that the County's receipt and use of CARES act funds was clearly consistent with U.S. Treasury CARES Guidance.

Should you have any questions or need further clarification or information, please do not hesitate to contact me.

Sincerely,



Kevin Kelleher  
Assistant County Administrator

#### Attachments

- c: Monica Cepero, County Administrator
- George Tablack, CPA, Chief Financial Officer
- Norm Foster, Director, Office of Management and Budget
- William O'Reilly, CPA, Director, Accounting Division
- Andrew J. Meyers, Broward County Attorney
- Bob Melton, Broward County Auditor, CPA, CIA, CFE, CIG
- Hisae Tanaka, Special Agent, OIG
- Jenna Gargano, Senior Assistant Legal Counsel, OIG

**Tablack, George**

**From:** Friedman, Brett <Brett.Friedman@rsmus.com>  
**Sent:** Thursday, December 3, 2020 11:37 AM  
**To:** Tablack, George; O'Reilly, William  
**Cc:** Harris, Anil; Mertilus, Sardou; Coulter, Kristy; Knowles, Chantelle  
**Subject:** re Presumptive use of Cares Act Funding for Public Health & Safety  
**Attachments:** Nassau CRF Ltr 10.16.20.pdf; Coronavirus-Relief-Fund-Guidance-for-State-Territorial-Local-and-Tribal-Governments.pdf; Treasury OIG FAQs November Update.pdf

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George

I took a look at the Treasury's FAQ (Updated in 10/20) and a document that summarizes the program (see attached highlights) and the November Update (11/25/20 see attached) specifically questions 80 through 82. The guidance as updated in September & November re-enforces the FAQ and the document Nassau County received from their legal counsel which was provided by you to us. From my read and based on confirmation with my National Industry Leader for State & Local Government the information from US Treasury supports the information provided by the attorney to Nassau County. I hope this helps and please advise if there is anything else we can assist with. Thanks.

**Brett Friedman**  
 Partner

**RSM US LLP**

100 NE 3rd Ave, Suite 300, Fort Lauderdale, FL 33301

D: 954.356.5721 F: 954.462.4607 | E: [Brett.friedman@rsmus.com](mailto:Brett.friedman@rsmus.com) | W: [www.rsmus.com](http://www.rsmus.com)



Stay *safe*  
 Stay *connected*

RSM offers business insights to stay informed and bolster your response to the COVID-19 crisis. For ideas, insights and countermeasures to minimize the outbreak's negative effects, as well as prepare for future emergency events—see RSM's Coronavirus Insights.



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(813) 281-0129 Fax

PLANTATION  
8201 Peters Road  
Suite 1000  
Plantation, Florida 33324  
(954) 315-0268 Tel

October 16, 2020

**Via Electronic Transmission**

Taco Pope  
Nassau County Manager  
96135 Nassau Place, Suite 6  
Yulee, Florida 32097

Re: Use of CRF Funds to Cover Public Health/Safety Employee Payroll Expenses

Dear Mr. Pope:

You have asked for advice on whether the County can fund fire and emergency medical services personnel costs incurred during the COVID-19 public health emergency with a portion of the County's Coronavirus Aid, Relief, and Economic Security ("CARES") Act subgrant award through the Florida Division of Emergency Management. Based upon and limited by the guidance outlined below, this question is answered in the affirmative.

The CARES Act provides that payments from the Coronavirus Relief Fund ("CRF") may only be used to cover costs that:

1. are necessary expenditures incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID-19);
2. were not accounted for in the budget most recently approved as of March 27, 2020 (the date of enactment of the CARES Act) for the State or government; and
3. were incurred during the period that begins on March 1, 2020, and ends on December 30, 2020.

The United States Department of Treasury has issued the "Coronavirus Relief Fund Guidance for State, Territorial, Local and Tribal Governments" ("Treasury Guidance"), the purpose of which is to provide guidance to recipients of CRF funding.<sup>1</sup> Treasury Guidance provides that payroll expenses for public employees whose services are "substantially dedicated" to mitigating or responding to the COVID-19 public health

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<sup>1</sup> The Treasury Guidance was initially released on April 22, 2020 and has been updated numerous times. In addition to providing guidance as to the interpretation of the three prongs of the CARES Act cited above, Treasury Guidance additionally includes answers to frequently asked questions.

emergency are eligible expenditures under the CARES Act. See Coronavirus Relief Fund Guidance for State, Territorial, Local and Tribal Governments (April 22, 2020).

With respect to the payroll expenses of public health and safety employees specifically, Treasury Guidance establishes that “as an administrative convenience in light of the emergency nature of the program,” there is a presumption that all public health/safety employees are substantially dedicated to mitigating or responding to COVID-19. Treasury Guidance issued on June 24, 2020, provides as follows:

**The Guidance says that funding can be used to meet payroll expenses for public safety, public health, health care, human services, and similar employees whose services are substantially dedicated to mitigating or responding to the COVID-19 public health emergency. How does a government determine whether payroll expenses for a given employee satisfy the “substantially dedicated” condition?**

The Fund is designed to provide ready funding to address unforeseen financial needs and risks created by the COVID-19 public health emergency. For this reason, and as a matter of administrative convenience in light of the emergency nature of this program, a State, territorial, local, or Tribal government may presume that payroll costs for public health and public safety employees are payments for services substantially dedicated to mitigating or responding to the COVID-19 public health emergency, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise.”

Pursuant to Treasury Guidance, it further appears that all public health/safety employees that were budgeted in the entity’s most recently approved budget as of March 27, 2020, are now considered to be performing a substantially different function and therefore are now considered “substantially dedicated” to mitigating or responding to COVID, and the payroll expenses of such budgeted employees during the covered period (March 1 - December 30, 2020) may be covered using CRF funds, unless the local government makes an express finding otherwise. Treasury Guidance provides as follows:

In recognition of the particular importance of public health and public safety workers to State, local, and tribal government responses to the public health emergency,

Treasury has provided, as an administrative accommodation, that a State, local, or tribal government may presume that public health and public safety employees meet the substantially dedicated test, unless the chief executive (or equivalent) of the relevant government determines that specific circumstances indicate otherwise. This means that, if this presumption applies, work performed by such employees is considered to be a substantially different use than accounted for in the most recently approved budget as of March 27, 2020. All costs of such employees may be covered using payments from the Fund for services provided during the period that begins on March 1, 2020, and ends on December 30, 2020.

Coronavirus Relief Fund Guidance for State, Territorial, Local and Tribal Governments (Update Dated September 2, 2020).<sup>2</sup>

Additionally, the following provision from Question 70 of the “Department of Treasury Office of Inspector General Coronavirus Relief Fund Frequently Asked Questions Related to Reporting and Recordkeeping,” dated September 21, 2020, provides further support for the proposition that public health/safety employees that were budgeted as of March 27, 2020, may be presumed to be substantially dedicated to responding to and mitigating COVID-19, and their payroll expenses during the covered period (March 1 through December 30) constitute an eligible expenditure under the CARES Act:

**For payroll that was accounted for in the FY2020 budget but was then “presumed” to be substantially dedicated to mitigating the emergency, will the government have to demonstrate/substantiate that a public health or public safety employee’s function was a substantially different use?**

No, the government will not have to demonstrate/substantiate that a budgeted public health or public safety employee’s function was a substantially different use. As stated in Treasury’s Guidance, within the category of substantially different uses, Treasury has included payroll and benefits expenses for public safety, public health, health care, human services, and similar

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<sup>2</sup> This interpretation was also verbally expressed by representatives of the Department of Treasury on a Webinar with the National Association of Counties (NACO) on October 8, 2020.

employees whose services are substantially dedicated to mitigating or responding to the COVID19 public health emergency. The Treasury OIG does require the government to maintain budgetary records to support the fiscal years 2019 and 2020 budgets.

Pursuant to Treasury Guidance, public health and safety employees that are eligible for the “substantially dedicated” presumption described above include police and sheriff officers, firefighters, emergency medical responders, correctional and detention officers, and those who directly support such employees such as dispatchers and supervisory personnel. See Coronavirus Relief Fund Guidance for State, Territorial, Local and Tribal Governments (Update Dated September 2, 2020).

Payroll expenses and benefits include the following: the costs of all types of leave (vacation, family-related, sick, military, bereavement, sabbatical, jury duty), employee insurance (health, life, dental, vision), retirement (pensions, 401(k)), unemployment benefit plans (federal and state), workers compensation insurance, and Federal Insurance Contributions Act (FICA) taxes (which includes Social Security and Medicare taxes). See Coronavirus Relief Fund Guidance for State, Territorial, Local and Tribal Governments (Update Dated June 30, 2020).

However, it should be noted that overtime, workforce bonuses, and hazard pay are not eligible expenses “across the board” for all public health/safety employees. Rather, these types of payroll expenses are only eligible in the event they can be tied directly to duties performed by the employee that are specifically related to COVID-19. See below example from Treasury Guidance:

For example, a recipient may use payments from the Fund to cover hazard pay for a police officer coming in close contact with members of the public to enforce public health or public safety orders, but across-the-board hazard pay for all members of a police department regardless of their duties would not be able to be covered with payments from the Fund.

Coronavirus Relief Fund Guidance for State, Territorial, Local and Tribal Governments (Update Dated September 2, 2020).

Taco Pope  
October 16, 2020  
Page 5

Please let me know if you have any additional questions or require additional clarification. While the Treasury Guidance on this issue appears clear, as with any federal grant program, the rules and interpretations from the granting agencies are often changing and such changes could modify the advice provided in this letter.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'H. Encinosa', written in a cursive style.

Heather J. Encinosa

HJE:sb

cc: Michael S. Mullin, County Attorney  
David Jahosky, GSG

**From:** Foster, Norman <NFOSTER@broward.org>

**Date:** Thursday, January 13, 2022 at 2:15 PM

**To:** Nelson, Richard <rinelson@broward.org>

**Cc:** Pope, Emily <EMPOPE@broward.org>, Steelman, Jennifer <JSTEELMAN@broward.org>

**Subject:** Requested information

...Municipal expenses related to COVID reimbursed by Broward County, Peoplesoft, as of Jan 13, 2022, total is \$69,121,102

**From:** O'Reilly, William <[WOREILLY@broward.org](mailto:WOREILLY@broward.org)>  
**Sent:** Wednesday, March 30, 2022 1:26 PM  
**To:** Tanaka, Hisae <[HTANAKA@broward.org](mailto:HTANAKA@broward.org)>  
**Cc:** Nelson, Richard <[rinelson@broward.org](mailto:rinelson@broward.org)>; Bryan, Gerald <[GEBRYAN@broward.org](mailto:GEBRYAN@broward.org)>  
**Subject:** OIG response

Good Afternoon Special Agent Tanaka:

I have organized information responsive to your request below in the OneDrive Folder linked below that you should be able to access and find contents organized in the numerical order requested.

 [OIG 03252022](#)

1. In respect to item No. 1 you will find 4 journal entries with back-up and a summary.
2. In respect to Item No. 2 you will find guidance from the OIG, particularly question 50, regarding inability to report interest on the portal. We had discussions with the OIG about this issue before the date of their guidance, but I cannot find an email to the effect.
3. In respect to Item No. 3, my recollection was incorrect. The interest was spent on vaccination programs as specifically approved by Commission on 12/14/2021. See the document "Legislative Text.PDF", and the email from Hodge Herman on 12/16/2021 to implement that 12/14/21 action as well as Vaccination invoice and Voucher Adjustment.
4. In respect to item No. 4 please find all Cares Act Reports, extension requests, and Close out instruction. Please note the first Cycle report was combined with the second Cycle report. The last CARES Act Report we filed was for the period ended June 30, 2021 based upon guidance we were given by the OIG as discussed in the email found in the subfolder "close out". The OIG instructed us to indicate the financial reporting was complete at that time even though the interest earnings were not disbursed yet because there was no place to report them. We also could not subsequently report on the portal the use of those interest earnings on the vaccination program because there is no ability to report the interest earnings or spending above allocated amount of financial assistance in the portal.

Regards,  
Bill



William (Bill) O'Reilly, CGFM, CPA  
Director of Accounting  
Accounting Division  
115 S. Andrews Ave., Suite 221  
Fort Lauderdale, FL 33301  
Office: 954-357-7212  
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Email: [woreilly@broward.org](mailto:woreilly@broward.org)  
[www.broward.org](http://www.broward.org)

**SHERIFF, BROWARD COUNTY, FLORIDA**  
**SCHEDULE OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCE –**  
**BUDGET AND ACTUAL – GENERAL FUND**  
**REQUIRED SUPPLEMENTARY INFORMATION (UNAUDITED)**  
**Year ended September 30, 2021**

	Budgeted Amounts			Variance with Final Budget Positive (Negative)
	Original	Final	Actual	
Revenues:				
County appropriation	\$ 990,554,260	\$ 1,065,222,802	\$ 1,046,106,571	\$ (19,116,231)
Expenditures:				
General – crime prevention:				
Personal services	385,424,900	381,783,871	373,134,102	8,649,769
Operations	57,905,960	60,828,051	50,818,439	10,009,612
Capital outlay	11,617,560	66,893,179	16,000,799	50,892,380
Contingencies/reserves/transfers	8,544,240	12,181,424	-	12,181,424
Total general – crime prevention	<u>463,492,660</u>	<u>521,686,525</u>	<u>439,953,340</u>	<u>81,733,185</u>
Bailiffs – court services:				
Personal services	10,422,620	10,422,620	8,804,114	1,618,506
Operations	60,280	60,280	46,445	13,835
Total bailiffs – court services	<u>10,482,900</u>	<u>10,482,900</u>	<u>8,850,559</u>	<u>1,632,341</u>
Consolidated Dispatch				
Personal services	42,140,290	46,140,290	46,354,520	(214,230)
Operations	944,630	965,848	553,518	412,330
Capital Outlay	90,000	98,950	12,370	86,580
Transfers/reserves	-	427,192	-	427,192
Total consolidated dispatch	<u>43,174,920</u>	<u>47,632,280</u>	<u>46,920,408</u>	<u>711,872</u>
Corrections and Rehabilitation				
Personal services	231,809,110	232,014,240	232,689,662	(675,422)
Operations	60,698,670	63,835,354	61,128,184	2,707,170
Capital outlay	1,439,820	4,327,788	1,958,562	2,369,226
Transfers/reserves	-	108,007	-	108,007
Total corrections and rehabilitation	<u>293,947,600</u>	<u>300,285,389</u>	<u>295,776,408</u>	<u>4,508,981</u>
Fire rescue and emergency services:				
Personal services	152,885,010	153,317,844	153,240,960	76,884
Operations	19,022,570	18,386,073	15,049,939	3,336,134
Capital outlay	2,018,110	7,032,183	4,523,698	2,508,485
Transfers/Reserves	5,530,490	6,399,608	-	6,399,608
Total fire rescue and emergency services	<u>179,456,180</u>	<u>185,135,708</u>	<u>172,814,597</u>	<u>12,321,111</u>
Debt Services				
Principal retirement	-	-	2,623,134	(2,623,134)
Interest and fiscal charges	-	-	126,687	(126,687)
Total debt services	<u>-</u>	<u>-</u>	<u>2,749,821</u>	<u>(2,749,821)</u>
Total expenditures	<u>990,554,260</u>	<u>1,065,222,802</u>	<u>967,065,133</u>	<u>98,157,669</u>
Excess of revenues over expenditures	-	-	79,041,438	79,041,438
Unexpended County appropriations, net of advance for prepaid items	-	-	(79,041,438)	(79,041,438)
Net change in fund balance	-	-	-	-
Fund balance at beginning of year	-	-	6,221,771	-
Changes in reserves for prepaids	-	-	53,200	-
Changes in reserves for inventory	-	-	(506,030)	-
Fund balance at end of year	-	-	\$ 5,768,941	-



Department Group	Home Dept Descr	Home Dept	Sum of Grand Total
Admin	Cash Bonds	12330	1,990.54
	Central Supply	12221	499.11
	Dept of Administration	12115	1,708.57
	Dept of Professional Standards	12610	3,370.61
	Dept. of Community Services	12020	43,719.59
	Digital Evidence Unit	12114	3,946.31
	Finance	12310	68,955.40
	Grants Management	12165	9,023.02
	Human Resources	12661	15,893.39
	Information Technology Div.	12410	8,022.47
	Internal Affairs/Prof. Comp.	12620	89,967.83
	Office of General Counsel	12050	1,910.35
	Office of Management & Budget	12163	23,632.99
	Office of the Sheriff	12011	4,189.44
	Policy & Accountability Div.	12621	11,184.07
	Public Corruption Unit	12619	34,774.63
	Purchasing	12220	10,843.84
	Recruitment	12668	19,071.66
	Risk Management	12051	178.52
	Special Events and Logistics	12023	40,440.75
Training Division/ICJS	12660	25,343.02	
<b>Admin Total</b>			<b>418,666.11</b>
Communications	Regional Communications	23600	54,588.12
<b>Communications Total</b>			<b>54,588.12</b>
DLE/Contract Cities	2016 COPS Hiring Grnt-Laud Lks	57043	2,020.95
	2019 Pompano COPS Hiring Grant	77252	4,896.11
	Cooper City District	23490	27,125.88
	Dania Beach District	23230	261,657.11
	Deerfield Beach District	23460	16,755.99
	International Airport	23240	52,896.26
	Lauderdale Lakes	23260	17,028.07
	Lauderdale-By-The-Sea	23475	68,315.54
	North Lauderdale	23480	2,347.89
	Oakland Park	23465	9,729.82
	Parkland	23495	1,805.01
	Pompano Beach	23455	316,602.32
	Port Everglades	23250	18,587.77
	Tamarac	23420	19,138.04
West Park/Pembroke Park	23500	47,017.89	
Weston	23445	5,349.86	
<b>DLE/Contract Cities Total</b>			<b>871,274.51</b>
DLE/REGIONAL	Central Broward	13270	19,222.37
	Counter Terrorism Unit	13830	28,458.24
	Court Services - Security	13415	1,283.91
	Covert Electronic Surveillance	13536	11,712.31
	Criminal Investigations	13720	13,077.26
	Digital Forensic Unit	13841	5,272.28
	Gang Unit	13545	9,741.03
	HIDTA 2019	57133	7,018.56

Department Group	Home Dept Descr	Home Dept	Sum of Grand Total
DLE/REGIONAL	Internet Crimes Against Childr	13840	53,656.93
	Law Enforcement Mgt	13110	18,213.11
	Manatee Patrol 18/19	57129	796.63
	Operations Administration	13201	110,001.73
	Organized Criminal Activities	13820	75,960.80
	Real Time Crime Center	13740	11,481.26
	Regional Narcotics	13543	114,655.18
	Regional Traffic Unit	13313	13,361.95
	Strategic Investig Admin	13535	46,717.85
	Support Services	13439	9,999.67
	Threat Management Unit	13741	2,632.62
	V.I.P.E.R. 17	13441	16,191.88
	West Broward	13440	1,403.14
Youth/Neighborhood Svc	13531	46,348.70	
<b>DLE/REGIONAL Total</b>			<b>617,207.41</b>
DOD	Conte Facility	44330	9,579.82
	Detention Administration	44100	31,587.08
	Detention Management	44110	54,856.04
	Inmate Behavioral Health Unit	44125	6,077.25
	Inventory Control	44430	257.22
	Main Jail Facility	44220	20,239.84
	Paul Rein Detention Facility	44340	40.92
<b>DOD Total</b>			<b>122,638.17</b>
Fire/Contract City	Cooper City Fire Rescue	88716	3,028.04
	Dania Beach Fire Rescue	88721	11,973.46
	Deerfield Beach Fire Rescue	88722	48,424.46
	Hallandale Beach Fire Rescue	88723	6,261.89
	Lauderdale Lakes Fire Rescue	88717	5,767.96
	Port Rescue	88720	25,546.89
	Spec Pur/Aircraft Rescue	88705	1,337.18
	West Park Fire Rescue	88718	2,389.79
Weston Fire Rescue	88714	12,503.22	
<b>Fire/Contract City Total</b>			<b>117,232.89</b>
Fire/REGIONAL	Air Rescue	88805	3,009.43
	Air-Sea Regional	88815	7,434.53
	Everglades	88832	3,419.04
	Fire Prevention	88710	41,750.74
	Fire Rescue - Administration	88725	34,455.78
	Fire Rescue Training	88735	60,760.48
	HAZMAT	88830	13,124.31
	LETJ-Juvenile Firesetters 2015	61760	1,126.10
	Logistics	88820	32,837.53
	Regional Administration	88840	50,447.42
	Regional Services Technology	88810	3,948.28
	Regional Training	88835	23,984.89
	TRT	88831	6,331.46
Unincorporated Fire Rescue	88713	10,602.86	
<b>Fire/REGIONAL Total</b>			<b>293,232.85</b>
<b>Grand Total</b>			<b>2,494,840.06</b>



Worked thru 6/30/2020

Dept Category	Home Dept Descr	Home Dept ID	Sum of Total Cost
DLE/Contract Cities	<b>2019 Pompano COPS Retention</b>	77252	4,705.16
	Cooper City District	23490	31,265.95
	Dania Beach District	23230	141,525.48
	Deerfield Beach District	23460	13,152.18
	International Airport	23240	23,958.52
	Lauderdale Lakes	23260	4,221.59
	Lauderdale-By-The-Sea	23475	15,993.88
	North Lauderdale	23480	8,297.56
	Oakland Park	23465	17,098.46
	Parkland	23495	6,902.37
	Pompano Beach	23455	163,081.68
	<b>Port Everglades</b>	23250	9,173.95
	Tamarac	23420	34,566.00
	West Park/Pembroke Park	23500	84,884.36
	Weston	23445	12,122.08
<b>DLE/Contract Cities Total</b>			<b>570,949.22</b>
Fire/Contract City	Cooper City Fire Rescue	88716	493.69
	Dania Beach Fire Rescue	88721	5,645.06
	Deerfield Beach Fire Rescue	88722	15,802.00
	Hallandale Beach Fire Rescue	88723	138.45
	Lauderdale Lakes Fire Rescue	88717	12,947.04
	<b>Port Rescue</b>	88720	16,359.43
	Weston Fire Rescue	88714	7,039.65
<b>Fire/Contract City Total</b>			<b>58,425.32</b>
<b>Grand Total</b>			<b>629,374.54</b>



Dept Category	Dept Descr	Home Dept ID	Sum of Total Pd
DLE/Contract Cities	Cooper City District	23490	47,699.36
	COPS Retention Laud Lakes	77097	2,038.72
	Dania Beach District	23230	2,467.10
	Deerfield Beach District	23460	22,764.91
	International Airport	23240	8,339.13
	Lauderdale Lakes	23260	19,066.47
	North Lauderdale	23480	9,290.41
	Oakland Park	23465	1,758.63
	Parkland	23495	245.18
	Pompano Beach	23455	195,681.68
	Pompano SRO Justice	81020	25,244.38
	<b>Port Everglades</b>	<b>23250</b>	<b>10,040.40</b>
	Tamarac	23420	20,691.04
	West Park/Pembroke Park	23500	33,018.45
	West Park-Pembroke Park Dist	23500	2,393.15
Weston	23445	71,006.49	
<b>DLE/Contract Cities Total</b>			<b>471,745.50</b>
FR/Contract Cities	Cooper City Fire Rescue	88716	3,916.98
	Dania Beach Fire Rescue	88721	4,291.24
	Deerfield Beach Fire Rescue	88722	6,867.90
	Hallandale Beach Fire Rescue	88723	14,596.75
	Lauderdale Lakes Fire Rescue	88717	2,186.39
	Spec Pur/Aircraft Rescue	88705	21,499.75
	Weston Fire Rescue	88714	29,097.85
<b>FR/Contract Cities Total</b>			<b>82,456.86</b>
<b>Grand Total</b>			<b>554,202.36</b>