

FREQUENTLY ASKED QUESTIONS FOR ELECTRONIC TECHNICAL ASSISTANCE COSTS

(Update: August 9, 2018)

1. What is an Electronic Technical Assistance Cost (ETAC)?

ETAC is for “reasonable and necessary regulatory technical assistance costs associated with the electronic submission of documents to the [F]und” through GeoTracker. (Health and Safety Code, section 25299.57(j)(1)). The purpose of ETAC is to assist with those additional costs incurred as a result of submitting a Fund application, reimbursement request (RR), and supporting documentation to the Fund electronically through GeoTracker, instead of submitting those documents to the Fund in hard copy.

2. What types of costs are considered ETAC?

The costs associated with an RR submission that properly are classified as ETAC are the cost of completing the following actions:

- 1) Entering data into the CUF Invoicing Summary electronic spreadsheet;
- 2) Error checking and correcting data on the GeoTracker CUF invoicing portal;
- 3) Converting documents related to an RR into an acceptable electronic format; and
- 4) Uploading documents related to an RR into GeoTracker.

If the claimant or the consultant already has the document in an acceptable electronic format, eligible ETAC is limited to the cost of uploading the document to GeoTracker. If the claimant or the consultant does not have the document in an acceptable electronic format, ETAC may include both the costs of scanning the document and uploading the document to GeoTracker.

Example 1: If a person is uploading a regulatory report that was completed (before January 1, 2005) to support an RR, then the cost for the time spent to convert the report from a Word version to a PDF version is acceptable ETAC. In addition, the cost for the time spent to upload the PDF version of the report into GeoTracker is also acceptable ETAC.

Example 2: If a person is uploading an RR into GeoTracker, the costs for the time spent entering the invoice line items from the invoices into the electronic invoicing spreadsheet as well as checking the spreadsheet for errors is acceptable ETAC. In addition, the costs for the time to convert the invoices from paper copy into a PDF document is also acceptable ETAC, as well as the cost for the actual time spent to upload the entire RR with documents.

3. Does ETAC include the upload of documents created prior to 2005 and the electronic data associated with these documents?

Yes, if those documents and the associated data were required by a regulatory agency and/or are submitted to the Fund as part of a claim application or RR.

4. How is ETAC different then RTAC?

All costs associated with preparing an RR other than the four (4) items listed above are necessary to prepare a hard copy or electronic RR, which must be classified as RTAC. *Essentially, all tasks that would be performed for preparing a hard copy of the RR would be considered RTAC* (regardless of whether it will be uploaded to GeoTracker).

Examples of typical RTAC costs include:

- Preparing Fund documents;
- Obtaining signatures;
- Compiling invoices;
- Obtaining or preparing supporting documents;
- Corresponding with Fund staff about RRs;
- Reviewing invoices for errors; and
- Obtaining or preparing proof of payment.

Uploading regulatory documents to GeoTracker to comply with regulatory requirements is not RTAC or ETAC and must be billed under the applicable budget category for that corrective action task.

5. Is there a maximum reimbursable limit for ETAC?

No, there is not a maximum reimbursable limit for ETAC. However, only reasonable and necessary ETAC charges are reimbursable. When evaluating reasonable and necessary costs associated with ETAC, the Fund utilizes the following method: *Total time spent for ETAC for a RR shall not exceed a cumulative total of 6 minutes per line item entered into the CUF Invoicing Summary.* If additional time is necessary, written justification should be provided with the costs.

Example: An RR consisting of 10 line items in the CUF invoicing summary could be reimbursed up to a maximum of 60 minutes for ETAC, regardless of whether the time is used for entering data, checking for errors, converting documents into electronic format, or uploading documents.

Note: Multiple line items for a single task that reasonably could be submitted as a single line item will be viewed as a single line item for purposes of calculating time spent on ETAC.

6. At what Rate should ETAC costs be billed?

Costs for ETAC should be billed by one of the following methods:

1. A "Reimbursement Specialist" classification may be billed at a rate up to \$70.00 per hour for all costs associated with RTAC and ETAC, if there are no supervisory costs associated for reviewing the RR; or
2. A "Clerical" classification may be billed at a rate of up to \$65.00 per hour for costs associated with RTAC and ETAC, if there also are supervisory costs being billed for

reviewing the RR. (Supervisory costs must be reasonable and necessary for reimbursement.)

7. How are ETAC charges identified?

On the vendor's invoices, ETAC should be identified for each invoice line item charge associated with the electronic submission of documents to the Fund. When uploading an RR electronically, these types of costs should be keyed in using either the ETAC or DB-ETAC category. *Please note: ETAC and RTAC costs need to be separated into separate line items.* For more information on how to upload an RR package electronically, see the Fund's website at: http://www.waterboards.ca.gov/water_issues/programs/ustcf/gto/.

Reasonable and necessary costs claimed for RTAC and ETAC must contain sufficient detail on the invoices and CUF invoicing summary to allow the Fund to determine which tasks were performed. Costs billed as RTAC or ETAC lacking sufficient detail may be considered ineligible. Sufficient detail includes at a minimum:

1. The name of the person performing the task, the date the task was performed, and amount of time necessary to complete the task;
2. The task performed (*Example 1: ETAC – Entering data into the CUF invoicing summary for RR #2; Example 2: ETAC – Uploading supporting documents to GeoTracker for RR #3*); and
3. The RR number or GeoTracker confirmation number to which the task is related.

8. How should ETAC be billed for final RRs?

All costs, including ETAC should be included in the final RR. In order to include all eligible costs in the final RR, the vendor may choose to begin preparing the final RR, then bill final ETAC, and list the final ETAC invoice as the last invoice on the RR.