

OHIO AUDITOR OF STATE KEITH FABER



88 East Broad Street
Columbus, Ohio 43215
ContactUs@ohioauditor.gov
(800) 282-0370

Auditor of State Advisory Memo

To: All Counties
All Metro Cities (see attachment)

From: Keith L. Faber, Auditor of State

Date: May 20, 2021
Updated June 30, 2021¹

Subject: **American Rescue Plan Coronavirus State and Local Fiscal Recovery Fund ID.me Submission Requirements and Fraud Protection Insurance**

Beginning in 2023, the Automated Standard Application for Payments (ASAP) system used by states to draw down Federal funds will use ID.me for authentication. The guidance provided in this Advisory is extended to apply to fraud protection for those officials that need to provide personally identifiable information to sign up for the ASAP system using ID.me.

In response to the pandemic, Congress has passed several pieces of legislation providing significant COVID-19 Federal funding among various new and pre-existing programs to states and local governments. The American Rescue Plan provides \$350 billion in emergency funding for eligible state, local, territorial, and Tribal governments to respond to the COVID-19 emergency and bring back jobs through Coronavirus State and Local Fiscal Recovery Funds.

The United States Department of Treasury has developed an online portal for primary (direct) recipients, like yourselves, to apply for these grant funds. The portal requires primary recipients to complete a series of identity verifications through ID.me.

Treasury's portal is available at [Coronavirus State and Local Fiscal Recovery Funds | U.S. Department of the Treasury](#), which lists the following submission requirements.

SUBMISSION REQUIREMENTS

To complete a submission on behalf of your jurisdiction, you will be asked to provide the following information:

1. Jurisdiction name, taxpayer ID number, DUNS Number, and address
2. Authorized representative name, title, and email
3. Contact person name, title, phone, and email
4. Funds transfer information, including recipient's financial institution, address, phone, and routing number and account number
5. Completed certification document (to be signed by the authorized representative)

¹ Updated June 2021 – Changes are marked with ~~strikeout font~~ and double underlined font.

Jurisdictions must submit a request to receive funding even if they have previously applied for other programs through the Treasury Submission Portal. Eligible jurisdictions will receive further communications regarding the status of their submission via the email address provided in the Treasury Submission Portal.

As part of the submission, your authorized representative will need to create an ID.me account and provide personal identifying information. They will also need a smart phone with camera to complete the setup of the account. Below is a list of the verifications and examples of required documentation.

Items you will need for ID.me account establishment:

- Smart Phone with Camera
- Laptop or Computer (optional)
- Email Address
- Social Security Number
- Photo ID (Driver's License, Passport, Passport Card or State ID)
- Secondary Identification Documents – 2 needed (Utility Bill, W2 form, Birth Certificate)

Getting Started:

Visit <https://portal.treasury.gov/cares/s/slt>, click on 'create an ID.me account', and follow the instructions.

Detailed Step by Step Instructions can be located at https://learn.id.me/rs/801-JLS-289/images/IDme_IAL2Liveness_Guide_Treasury.pdf.

Should a Secondary Identification be required you may be asked to verify your identity on a video call and provide 2 secondary forms of identification.

When you've finished the verification process, you will get a confirmation email that allows you to log in to the State, Local, and Tribal Portal with your new ID.me account.

Risk of Identity Theft:

The Portal states that throughout this process, information will remain completely secure. However, officials have understandably expressed concerns over having to submit personal identifying information to apply for public grant funds.

Therefore, the Auditor of State will not take exception to entities who purchase ~~1-year~~ fraud protection for the length of the program for individuals submitting their personal information for application of these funds assuming the level of coverage is reasonable.

The payment for this coverage must be paid for using local unrestricted funds. We are currently discussing with federal counterparts if this expenditure meets the criteria for an allowable cost under the American Rescue Program Funds. Further information will be forthcoming as this issue is determined.

Please direct any questions to the Center for Audit Excellence at FACCR@ohioauditor.gov

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