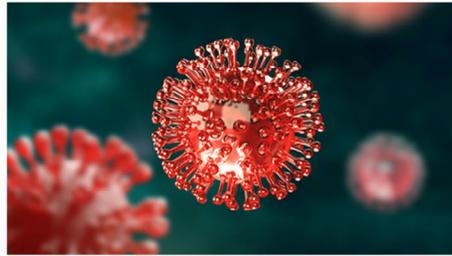


Coronavirus Relief Fund: How to Choose a FACCR

Presented by: Amanda Stidham, CPA, CFE
Quality Assurance and Technical Specialist

Coronavirus Relief Fund

- What are the sources of the funding?
- Why are there so many FACCRs?
- How do I choose which FACCR to use?

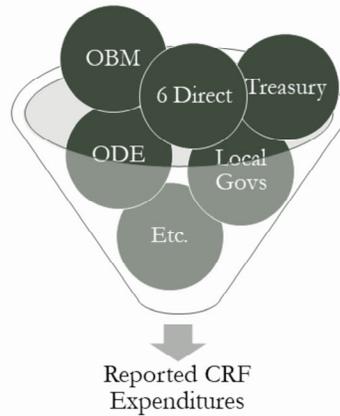


Efficient • Effective • Transparent

2

We're going to tackle three main questions in the quick training.

What are the sources of the funding?



Efficient • Effective • Transparent

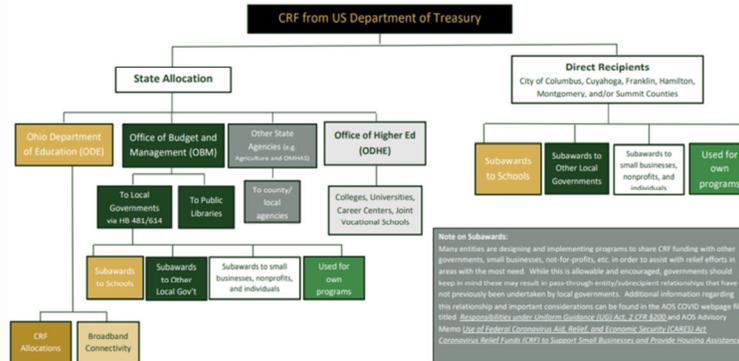
3

This slide provides a simplistic illustration of what goes into the coronavirus relief fund expenditures which are ultimately reported on the entity's SEFA. The sources of funding include, but are not limited to, Treasury, the 6 direct recipients, Ohio Office of Budget and Management, Other local governments, and the Ohio Department of Education.

It's important to remember that this is ONE major program, regardless of the number of funding sources.

What are the sources of the funding?

Coronavirus Relief Fund (CRF) Where Does It Come From?



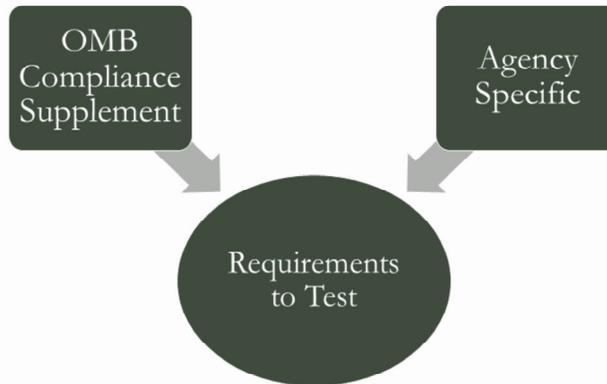
https://ohioauditor.gov/resources/covid19/CRF_Flowcharts_Funding.pdf

Efficient • Effective • Transparent

4

This decision tree goes into much greater detail on the sources of funding for local governments. The link is shown below and I encourage auditors to review this resource when testing SEFAs in the field. It's vitally important to accurately determine all sources of CRF funding during testing of the SEFA, BEFORE starting major program testing as the sources of funding will dictate the FACCR selected and ultimately the testing performed. Auditors should keep in mind that some payments received from other governments may appear to be pass-through grants when in reality they may be contract payments or payments received as a beneficiary. Please refer to the SEFA completeness guide for more information on contract/beneficiary payments. Remember that when evaluating the coronavirus relief fund for major program determination in the RSAR, you must evaluate the program expenditures in total, NOT by pass-through agency.

Why are there so many FACCRs?



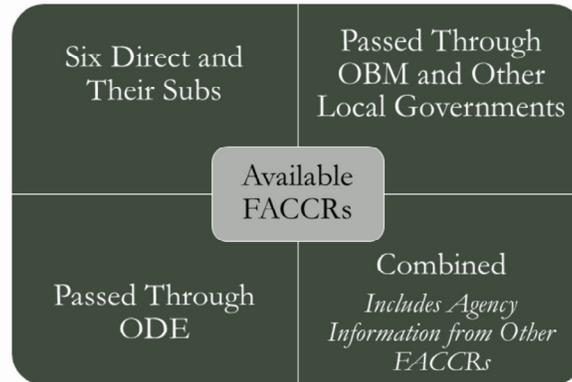
Efficient • Effective • Transparent

5

In short – because we are required to test compliance with items for the CRF program as set forth by the OMB Compliance Supplement AND agency-specific requirements which are imposed by pass-through entities. Because CRF is passed through a variety of pass through agencies, auditors will need to look at specific pass-through requirements set by each pass through entity providing material funding to the auditee.

We provide FACCRs tailored to the most common pass through agencies providing funding to Ohio governments.

Why are there so many FACCRs?



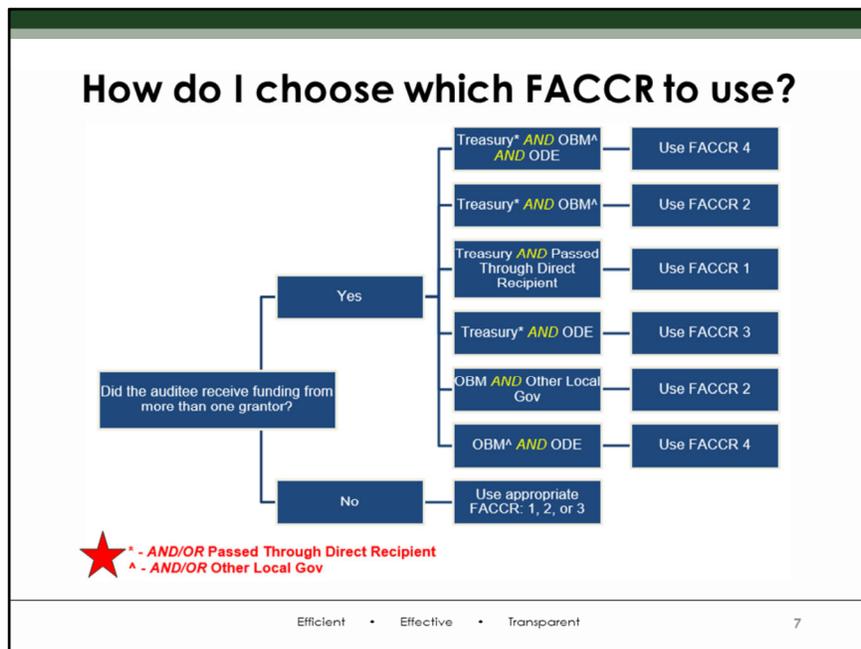
Efficient • Effective • Transparent

6

Once you determine that CRF is a major program and are ready to start your testing, you'll notice that there are four FACCRs available for 2021 CRF testing.

1. Six direct and their Subs – tailored for the six entities who received funding directly from Treasury (City of Columbus, Hamilton, Franklin, Cuyahoga, Summit, and Montgomery Counties) and their Subrecipients
2. Passed through OBM and Other Local Governments – tailored for entities who received CRF monies passed through OBM via House Bills 481 and 614 as well as passed through other local governments (counties, cities, villages, etc.)
3. Passed through ODE – tailored for entities who received CRF passed through Ohio Department of Education (includes general CRF as well as Broadband Connectivity Program)
4. Combined – combines the guidance in the other three FACCRs for those entities receiving funding from more than one source

You may be wondering about what to do if your entity receives material funding from a source NOT encompassed by these existing FACCRs – such as Ohio Office of Higher Ed (as listed on the decision tree). If you run into that situation, contact CFAE via the FACCR Specialty in Spiceworks for AoS employees or the FACCR inbox for IPAs.



ONCE YOU HAVE TESTED THE SEFA AND DETERMINED THE PASS THROUGH AGENCY / AGENCIES SUBJECT TO TESTING, THEN YOU WILL NEED TO DETERMINE WHICH FACCR TO PULL IN FOR TESTING.

The decision tree on this slide is at the beginning of each of the CRF FACCRs available on the internet and intranet. This tree was designed to walk you through the process of determining which FACCR should be used based on your particular situation.

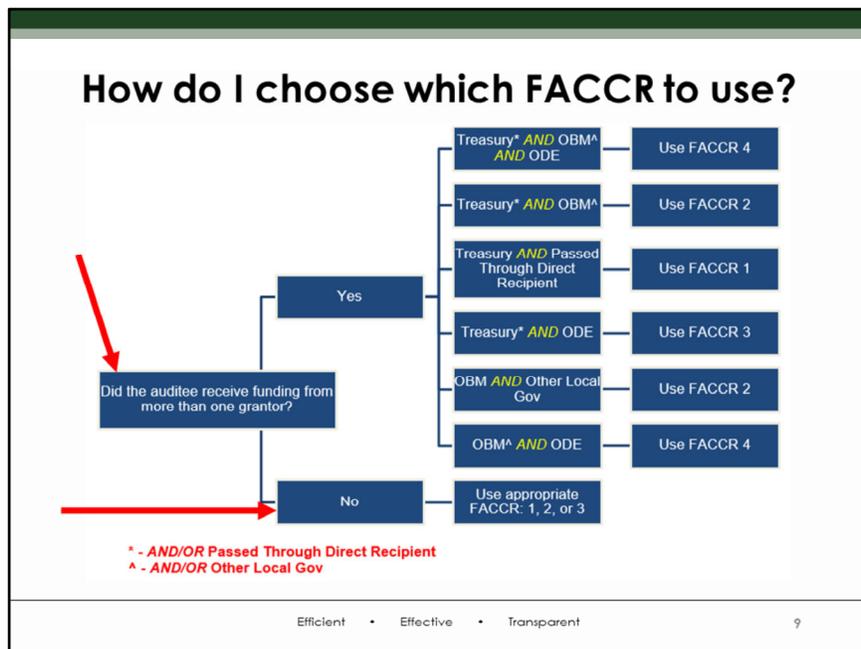
***In order to simplify the decision tree – the symbols noted here were used. When the decision tree says Treasury with an asterisk, it means received directly from Treasury AND/OR passed through a direct recipient. When the decision tree says OBM with a caret, it means received from OBM AND/OR passed through another local government.

How do I choose which FACCR to use?

Available CRF FACCRs (Numbers Correspond to FACCR References in Chart Below):

1. Six Direct Recipients and their Subrecipients
 - Includes guidance specific to the six direct recipients (City of Columbus and Cuyahoga, Franklin, Hamilton, Montgomery, and Summit Counties) as well as amounts passed to other entities from those direct recipients.
2. Passed Through OBM and Other Local Governments
 - Includes guidance specific to those receiving CRF monies passed through OBM via HB 481 and 614 as well as passed through other local governments (Counties, Cities, Villages, etc.).
3. Passed Through ODE
 - Includes guidance specific to those receiving CRF monies passed through ODE.
4. Passed Through a Direct Recipient, OBM, Other Local Governments, and/or ODE
 - Combines the guidance in the three other available FACCRs.

This legend is included in bold, red font in each faccr and provides details on the FACCRs referenced in the decision tree. You'll note that the decision tree labels FACCRs as 1-4. Those numbers correspond to the numbered FACCRs on this list.



First question – look at the SEFA and determine if there was one funding source for CRF or more than one.
 If one source – go to “no” – directs you to use either FACCR 1, 2, or 3 depending on the funding source. NEXT SLIDE DETAILS WHICH FACCR TO USE IN WHICH SITUATION

How do I choose which FACCR to use?

Available CRF FACCRs (Numbers Correspond to FACCR References in Chart Below):

- ★ 1. Six Direct Recipients and their Subrecipients
 - Includes guidance specific to the six direct recipients (City of Columbus and Cuyahoga, Franklin, Hamilton, Montgomery, and Summit Counties) as well as amounts passed to other entities from those direct recipients.
- ★ 2. Passed Through OBM and Other Local Governments
 - Includes guidance specific to those receiving CRF monies passed through OBM via HB 481 and 614 as well as passed through other local governments (Counties, Cities, Villages, etc.).
- ★ 3. Passed Through ODE
 - Includes guidance specific to those receiving CRF monies passed through ODE.
4. Passed Through a Direct Recipient, OBM, Other Local Governments, and/or ODE
 - Combines the guidance in the three other available FACCRs.

Efficient • Effective • Transparent

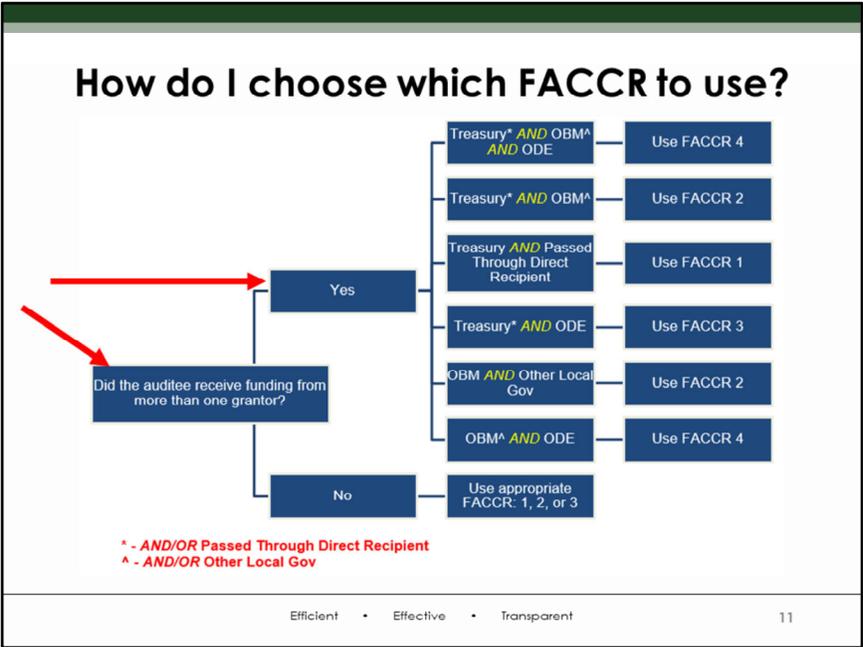
10

Use FACCR 1 if the funding source is Treasury (i.e. if auditing one of the six direct recipients) or is a grant passed through one of the six direct recipients.

Use FACCR 2 if the funding source is OBM or another local government

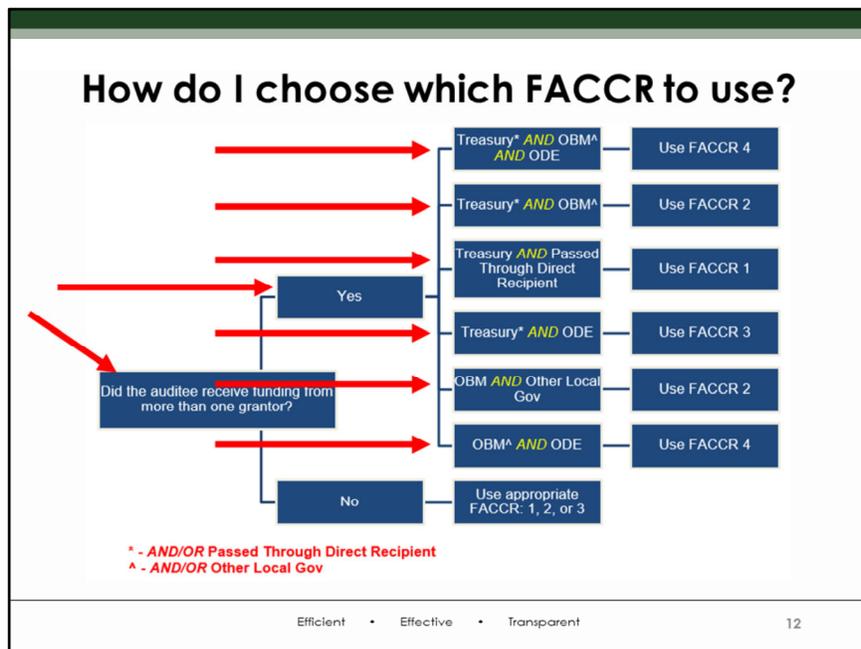
Use FACCR 3 if the funding source is ODE

****REMEMBER THAT THE DETERMINATION IS BASED ON PASS THROUGH ENTITY, EVEN IF YOU HAVE MULTIPLE FUNDING STREAMS FROM A PARTICULAR PASS THROUGH (i.e. money from ODE only but received both CRF general and broadband connectivity, you would still use FACCR 3)****



First question – look at the SEFA and determine if there was one funding source for CRF or more than one.

If more than one source – go to “yes” and then determine the funding sources in order to determine the FACCR to use.



Will briefly go through scenarios and which faccr to use:

1. Funding received from Montgomery County (one of the six direct recipients), Greene County (“other” local government) and ODE – use FACCR 4 (Combined)
2. Funding received from Montgomery County (one of the six direct recipients) and OBM via HB 481/614 – use FACCR 2 (PT OBM and Other Local Govs)
3. Funding received from Treasury directly and a direct recipient (for example if the City of Columbus – a direct recipient – also received funding from Franklin County – another direct recipient) – use FACCR 1 (Direct and Their Subs)
4. Funding received from the City of Columbus (one of the six direct recipients) and ODE for both general CRF and Broadband Connectivity – Use FACCR 3 (PT ODE)
5. Funding received from OBM via HB 481/614 and Greene County (“other” local government) – Use FACCR 2 (PT OBM and Other Local Govs)
6. Funding received from a City (NOT a direct recipient) and ODE – Use FACCR 4 (Combined)

Reminder

Important Notes:

- When auditees receive CRF monies from various sources, auditors may use one FACCR to test the CRF program (as detailed in the table on page 2); however, the funding streams have unique restrictions imposed by the pass-through agencies therefore the streams should be tested as **separate populations**. If auditees receive more than one grant from a given pass-through entity and the grants have differing restrictions or goals (for instance, a School District receives both general CRF funding and a broadband grant from ODE), auditors will need to test the individual grants as separate populations.
- If an exception is noted during testing within one of several populations tested, auditors should evaluate the exception in relation to the CRF funding **as a whole**. AOS Auditors should also review Audit Manual Section 34900.18-.20 and .25-.26.

The FACCR contains the important notes shown on this slide, in bold, red font. Please pay attention. An additional mini-training is in development to go into detail regarding how to determine the populations for your testing, if CRF is a major program, the SAM, AM, and staff auditor assigned to test the CRF FACCR should view this training prior to starting testing.

Recap



1. Determine the auditee's funding source(s).
2. Utilize decision tree provided in each CRF FACCR to determine which FACCR fits your auditee's situation.
3. Contact CFAE with any unique situations or questions.



**Please send Federal Questions
to FACCR@ohioauditor.gov**

Amanda Stidham, CPA, CFE
Quality Assurance and Technical Specialist

88 East Broad Street

Columbus, Ohio 43215

phone: (800) 282-0370

AMStidham@ohioauditor.gov

