

Schedule of Federal Award Expenditures (SEFA) Completeness

This document does not include all Federal programs an entity might report; rather it contains the SEFA reporting information from each FACCRS prepared by CFAE. This document is updated on a regular basis as the FACCRs are updated.

This information is sorted by Assistance Listing (previously known as CFDA) number and bookmarked.

AOS Auditors: In addition to the documentation in this file, please review the guidance and test the SEFA Completeness procedures in TeamMate.

YEAR ENDED:	2021
FEDERAL AWARD NAME:	General Guidance for Grants

Reporting in the Schedule of Expenditures of Federal Awards

The auditee must prepare a schedule of expenditures of Federal awards for the period covered by their financial statements, which must include the total Federal awards expended as determined in accordance with [2 CFR § 200.502](#).

Reminder: For reporting purposes on the SEFA, we are looking at when the ***expenditure was MADE*** not when the revenue was received. Additionally, Auditors should be aware of the period in which expenditures are able to be incurred for COVID-19 Programs, as expenditures may have occurred during the fiscal year but not reimbursed until after fiscal year end.

While not required, the auditee may choose to provide information requested by Federal awarding agencies and pass-through entities to make the schedule easier to use. For example, when a Federal program has multiple Federal award years, the auditee may list the amount of Federal awards expended for each Federal award year separately.

At a minimum, per 2 CFR 200.510, the schedule must:

List individual Federal programs by Federal agency. For a cluster of programs, provide the cluster name, list individual Federal programs within the cluster of programs, and provide the applicable Federal agency name. For R&D, total Federal awards expended must be shown either by individual Federal award or by Federal agency and major subdivision within the Federal agency. For example, the National Institutes of Health is a major subdivision in the Department of Health and Human Services.

For Federal awards received as a subrecipient, the name of the pass-through entity and identifying number assigned by the pass-through entity must be included.

Provide total Federal awards expended for each individual Federal program and the Assistance Listing number or other identifying number when the Assistance Listing information is not available. For a cluster of programs also provide the total for the cluster.

Include the total amount provided to subrecipients from each Federal program.

For loan or loan guarantee programs described in § 200.502 Basis for determining Federal awards expended, paragraph (b), identify in the notes to the schedule the balances outstanding at the end of the audit period. This is in addition to including the total Federal awards expended for loan or loan guarantee programs in the schedule.

Include notes that describe that significant accounting policies used in preparing the schedule, and note whether or not the auditee elected to use the 10% de minimis cost rate as covered in [2 CFR § 200.414](#) Indirect (F&A) costs.

NOTE – COVID FEDERAL EXPENDITURES:

Auditors should inquire with their entity to determine if the government received COVID-19 Federal Funding. Additional COVID-19 resources, including the CARES Act and Federal Assistance Spreadsheet, is available at https://ohioauditor.gov/resources/COVID19_assistance.html.

Expenditures of COVID-19 related funding must be identified on a separate line item with a designation identifying them as Covid-19 Funding. Example:

10.555	National School Lunch Program	\$XX,XXX
10.555	Covid-19 National School Lunch Program	\$XX,XXX

SEFA and Footnote resources are available for AOS Staff on the Federal Reporting Practice Aids page of the Intranet and for local governments and IPAs on the [Single Audit Practice Aids & Audit Report Shells Internet Page](#), including SEFA and Footnote shells.

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Supplemental Nutrition Assistance Program (SNAP) Cluster – County JFS Only
Assistance Listing #:	#10.551 Supplemental Nutrition Assistance Program (SNAP) #10.561 State Administrative Matching Grants for the Supplemental Nutrition Assistance Program

This program specific guidance is in addition to the general reporting requirements on page 2.

SNAP (Food Assistance) benefits are regulated by the United States Department of Agriculture – Food and Nutrition Services, the regulations are implemented by the state and the benefits are then county administered. The State has the responsibility to regulate that administration; therefore, the State Region will audit eligibility and recipient benefit payments.

The County federal schedule will report direct administrative and other expenditures (whether charged directly to the program or allocated through a cost allocation plan or cost pool) paid by the County.

For guidance on ODJFS grants reported on counties SEFA's, auditors should refer to the ODJFS prepared PA and CSEA Federal grant templates at <http://jfs.ohio.gov/ofs/bcfta/TOOLS/tools1.stm>. While the CR 504 CFDA report is a good starting point for counties to determine the expenditures to be reported on the SEFA, there are some programs or parts of program that are not reflected in either of these report. The spreadsheets provide program specific information for testing the SEFA.

Per ODJFS, all grants are reported on a cash basis and should be presented likewise on the SEFA.

To ensure expenditures are reported accurately by Assistance Listing #, auditors should also determine how multi-agency contract expenditures are recorded on the schedule of federal awards expenditures.

The local government should report federal expenditures for Assistance Listing #10.551/10.561. [2 CFR 200.510 \(b\)\(2\)](#) (2 CFR 400.1 giving regulatory effect) requires including pass-through numbers (if any) on the Schedule. Counties should report the subgrant agreement number (i.e. G-2021-11-5006) as the pass through number and roll the grants up in total by Assistance Listing. Please note there may be two subgrant agreements in place for the calendar year. If that is the case then report both numbers (i.e. G-2021-11-5006 / G-2021-11-5007).--

(Note: It is doubtful counties receive funding under 10.551 due to this portion of the Cluster being for the recipient benefits. Auditors should discuss with the County JFS if these funds were received by the County.)

SNAP Cluster	Assistance Listing #	Pass through number	Expenditures
Supplemental Nutrition Assistance Program (SNAP)	10.551	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX
State Administrative Matching Grants for the Supplemental Nutrition Assistance Program (Administrative Costs)	10.561	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX

Note: The Pandemic EBT program is reported under AL #10.542 (Food Benefits) and AL #10.649 (Administrative Costs).

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Child Nutrition Cluster
Assistance Listing #:	#10.553 School Breakfast Program (SBP) #10.555 National School Lunch Program (NSLP) #10.556 Special Milk Program for Children (SMP) #10.559 Summer Food Service Program for Children (SFSP) #10.579 Child Nutrition Discretionary Grants Limited Availability

This program specific guidance is in addition to the general reporting requirements on page 2.

NOTE: Legacy cash reports are available to schools and their auditors to aid in preparation of the SEFA. A cross walk of Web-GAAP alternatives is located within the Web-GAAP wiki, which can be accessed using the following link: <http://gaapwiki.oecn.k12.oh.us/images/1/19/4502Web-GAAPAlternatives.pdf>. Keep in mind that district use of Web-GAAP is not mandatory and some districts may not utilize these reports. Any SEFA format is acceptable so long as it complies with the requirements above and those of 2 CFR 200.510(b).

(Source: CFAE)

Valuing USDA Donated Foods

The distributing agency or recipient agency must consider the value of USDA donated foods as part of the Nutrition Cluster grants as indicated above. There are two steps in accomplishing this:

1. Determining the quantity of each USDA donated food "expended".
 - a. A distributing agency, and a recipient agency in CSFP, TEFAP, or FDPIR, must consider all USDA donated foods ***distributed or used*** in a school or fiscal year as expended.
 - b. A recipient agency in NSLP, CACFP, or SFSP, or a charitable institution that receives donated foods in accordance with § 250.67, must consider all USDA donated foods ***received*** in a school or fiscal year as expended.
2. Assigning value to the quantity of each USDA donated food "expended".

In accordance with Section 502(g) of the Uniform Guidance ([2 CFR 200.502\(g\)](#)), Federal non-cash assistance, such as USDA donated foods, must be valued at either fair market value (FMV) at the time of receipt, or at the value determined by the Federal agency. Accordingly, for audit purposes, a distributing or recipient agency may use either the FMV of donated foods at the time of their receipt or one of the donated food valuation methods included in [7 CFR 250.58\(e\)](#).

Each distributing or recipient agency must choose a method of valuing donated foods for audit purposes. In most cases, it would probably be easier for a distributing or recipient agency to use one of the options listed in 7 CFR 250.58(e), rather than having to determine the FMV at the time of their receipt. However, in some cases it may be easier to use the FMV. Once a distributing or recipient agency has selected a method of assigning value to donated foods, it must use that

method consistently in all of its audit activities, and must maintain a record of the means of valuing donated foods for such purpose.

(Source: [USDA Food Distribution National Policy Memorandum FD-104](#), Revised 12/2/2016)

State of Ohio

- The CATS system is the required system for all schools ordering commodities **directly** from ODE. Schools receiving commodities through the Southwest Ohio Educational Purchasing Council (SWEPC) co-op **will not** have their activities reflected in CATS. Please refer to the [list of schools](#) that participate in the SWEPC co-op.
- For schools receiving commodities through the SWEPC, auditors should utilize confirmation from the SWEPC (for instance, a PAL report) to verify the commodities reported on the SEFA.
- For schools who are **not** members of the SWEPC (i.e. order commodities directly from ODE):
 - The State Region identified deficiencies during the FY21 State of Ohio audit which may result in errors on the CATS reports for schools ordering commodities directly from ODE. As such, auditors should verify that schools ordering commodities directly from ODE have controls in place to verify that the amount of commodities per the CATS report are accurate. These controls should be documented and tested during SEFA testing.
 - Note that in the past, some schools utilized order forms from the CATS system to calculate commodities. Per ODE, this method is not correct as occasionally schools do not receive everything they order.
 - As noted above, schools may select to calculate the FMV of their commodities at the time of receipt, or use the value determined by the Federal agency.
 - If the school participates in the government donated food program, utilizes the CATS system, and uses FMV, you must obtain their support and calculations, and test such.
 - If the school participates in the government donated food program, utilizes the CATS system and used the value determined by the Federal agency, then ODE uses the option “the USDA commodity file cost as of a date specified by the distributing agency” via the CATS system. In February 2014, ODE created a report available in the CATS system to assist clients & auditors in determining this value. The following steps will explain how to obtain this report, as long as the school used the CATS system. The report is available beginning with FY 2013, and will reflect the information in the system at the time the report is generated.
 - In the CATS system, the school can obtain the necessary reports by following these steps.
 - Upon logging into the CATS system, the client should click on “Reports”, then “Value of Commodities Offered/Received”, then choose your program year, ensure the entity name appears in the “Agency” field and click on “Create Report” – this brings up the “Value of Commodities Offered-Received” report. To obtain the commodity value to report on the Federal Schedule, add the figures under the “Received Entitlement Value” and “Received Bonus Value” columns. (While the “Received Converted Value” column is not currently being utilized, if an amount appears in this column in the future, it would need included as well.)
 - To print this page, click on the drop down arrow next to the words “Select a format”, select “pdf” and click the “export” button.

- If the school participates in the Department of Defense (DoD) Fresh Fruit and Vegetable Program, the Department of Defense (DoD) Fresh Fruit and Vegetable Program entitlement value would be contained within the Received Entitlement Value figure presented on the Value of Commodities Offered-Received report since it has been transferred to the Department of Defense. However, you will need to obtain the school's support for the amount of the Department of Defense (DoD) Fresh Fruit and Vegetable Program entitlement value that was actually used and adjust the Received Entitlement Value by the unused Department of Defense (DoD) Fresh Fruit and Vegetable Program entitlement value portion.
- If the school previously participated in the Kosher Food Program, the Kosher Food Program entitlement value is not contained within the Received Entitlement Value figure presented on the Value of Commodities Offered-Received report. Obtain the schools support for the amount of Kosher Food entitlement value used. Add the Kosher Food entitlement value used to the Received Entitlement Value and the Received Bonus Value. Please note that USDA discontinued support of the Kosher Food Program in 2020.
- Processing charges and S&H charges are not included in the values on this report, as they do not get included in the commodities figure on the SEFA. Note as of FY 2016, schools using the state commodity system were not charged shipping fees at all because ODE had enough to cover their administrative fees that year – this is determined on a year by year basis.

PLEASE NOTE:

- ODE informed us OAKS is not currently assigning pass-through numbers.
- Not all schools receive “bonus commodities”, which are commodities received in addition to their commodity entitlement.

(Source: Ohio Department of Education)

Covid-19 Funding

Auditors may see negative amounts under the Nutrition Cluster amounts listed on the State Distribution Transaction Listing. These negatives are due to the reallocation of federal reimbursements due to Covid-19 funding.

ODE provided us with a detailed [spreadsheet for FY21](#) sorted by Assistance Listing number to enable Entities and Auditors to more accurately determine the amounts that should be reported under each Assistance Listing number and which amounts should be identified in the SEFA as Covid-19 funding expenditures/reimbursements. The Grant ID identifies the program under which the payment should be reported.

Some FY20 reallocations and reimbursements did not occur until after FY20 Fiscal Year end but should have been included on the FY20 SEFA as they were related to FY20 federal expenditures. ODE provided an additional [spreadsheet for July-September 2020](#) detailed and sorted by Assistance Listing number. Not all amounts identified on this supplemental spreadsheet are FY20 expenditures. Auditors will need to review supporting documentation at the individual entities to verify an amount was properly included or excluded from the SEFA for FY20 and verify those amounts aren't improperly included on the FY21 SEFA

ODE will not be providing a spreadsheet for July – September 2021 as ODE does not anticipate negative adjustments subsequent to fiscal year 2021 year-end.

Due in large part to the impact of the COVID-19 pandemic, some schools may have Federal receipts in excess of total food service expenditures for fiscal year 2021. Reported SEFA expenditures are limited to actual expenditures

plus commodities. For entities that received COVID-19 funding for Child Nutrition Cluster, it should be assumed that receipts are spent on a first in – first out basis. Clients and auditors should track the receipts carried into the subsequent fiscal year and report on the subsequent SEFA accordingly.

(Source: [AOS CFAE](#) and [ODE](#))

YEAR ENDED:	2021
FEDERAL AWARD NAME:	WIC Special Supplemental Nutrition Program for Women, Infants, and Children
Assistance Listing #:	#10.557

There is no program specific guidance, please follow the general reporting requirements on page 2.

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Water and Waste Disposal Systems for Rural Communities
Assistance Listing #:	#10.760

This program specific guidance is in addition to the general reporting requirements on page 2.

Interim Financing

After RUS has made a commitment on a loan, the borrower may be required to obtain interim financing from commercial sources (e.g., a bank loan) for the construction period (7 CFR 1780, section 1780.39(d)). Interim financing is required for all loans over \$500,000, except in documented instances where financing cannot be obtained at reasonable rates. Expenditures from these commercial sources that will be repaid from the proceeds of the RUS loan should be considered federal awards expended, included in determining Type A programs, and reported in the Schedule of Expenditures of Federal Awards.

Status of Outstanding Loan Balance After Project Completion

In years after the program funds are expended and construction is completed, and the only ongoing financial activity of the program is the payment of principal and interest on outstanding loan balances, the prior loan balances are not considered to have continuing compliance requirements under 2 CFR 200, section 200.502(d). Prior loans that do not have continuing compliance requirements other than to repay the loans are not considered federal awards expended and, therefore, are not required to be audited under 2 CFR Part 200, Subpart F.

However, this does not relieve the borrower of the requirement to file financial reports on these loans (which are not required to be audited) or otherwise comply with program requirements (e.g., maintaining insurance, depositing funds in federally insured banks, obtaining prior approval for sales of plant).

(Source: 2021 OMB Compliance Supplement, Part 4, U.S. Department of Agriculture AL #10.760 Water and Waste Disposal Systems for Rural Communities, Other Information)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	CDBG – Entitlement Grants Cluster
Assistance Listing #:	#14.218 Community Development Block Grants / Entitlement Grants #14.225 Community Development Block Grants / Special Purpose Grants / Insular Areas

This program specific guidance is in addition to the general reporting requirements on page 2.

Schedule of Expenditures Reporting Guidance:

- Block grant/Entitlement grant program
 - Reported on the SEFA in accordance with [2 CFR 200.502\(a\)](#)
- Not a loan / loan guarantee program as defined in the Uniform Guidance
 - Not reported on the SEFA in accordance with [2 CFR 200.502](#) (b) & (d)
- Program income:
 - Loan repayments and interest income are referred to as program income by the local governments but it is not program income under the Uniform Guidance.
- If there are material funds on hand with no activity for an extended period of time, auditors will inquire if the activity is reported on the required semi-annual report and verbally recommend the local government (Community) discuss the status of these funds with HUD.

Legend:

SEFA = Schedule of Expenditures of Federal Awards

DCF = Data Collection Form

HUD = Department of Housing and Urban Development

Schedule of Expenditures of Federal Awards (SEFA) Reporting	Expenditures Reported on SEFA & DCF	Expenditures Not Reported on SEFA & DCF
Project based expenditures	X	
<u>Initial loans</u> issued from grant (not expenditures from reloaned amounts from revolving loan program income – see program income expenditures below)	X	
Grants to subrecipients	X	

Repayment of unused program income revolving loan grant funds or unused project grant funds		X
Program income expenditures (revolving loan grant repayments of principal and interest income)		X

(Source: Department of Housing and Urban Development)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	CDBG – Community Development Block Grant/State’s Program and Non-Entitlement Grants in Hawaii
Assistance Listing #:	#14.228

This program specific guidance is in addition to the general reporting requirements on page 2.

COVID-19 Funding:

Grant agreements with COVID-19 funding provide information related to the funding source in Attachment A – Scope of Work and Budget. Attachment A includes the “Program Application Type” field which notes the funding is COVID related (e.g. “CDBG CARES”) and the Grant Number field includes grant numbers with a “-4” or “-5” at the end, indicating CARES Act funding (e.g. B-D-20-1DA-4”).

Ohio Development Services Agency, Office of Community Development (OCD) Schedule of Expenditures Reporting Guidance:

- Funding passed through from the Ohio Development Services Agency (ODSA), Office of Community Development (OCD)
- Non-entitlement grant program
 - Reported on the SEFA in accordance with [2 CFR 200.502](#) a
- Not a loan / loan guarantee program as defined in the Uniform Guidance
 - Not reported on the SEFA in accordance with [2 CFR 200.502](#) b & d
- Program income:
 - Loan repayments and interest income are referred to as program income by OCD and the local governments but it is not program income under the Uniform Guidance.
 - Reported by local governments semi-annually and monitored by OCD
 - Must meet block grant requirements in accordance with the signed administrative agreement between the local government and OCD every 3 years
 - OCD may grant waivers for the use of program income funds for alternative purposes.
- If there are material funds on hand with no activity for an extended period of time, auditors will inquire if the activity is reported on the required semi-annual report and verbally recommend the local government (Community) discuss the status of these funds with OCD.
- OCD has requested Community grant recipients include in their SEFA Footnotes the following disclosure:

The current cash balance on “Community’s” local program income account as of “date” is “\$000,000.00”.

Legend:

SEFA = Schedule of Expenditures of Federal Awards

DCF = Data Collection Form

Schedule of Expenditures of Federal Awards (SEFA) Reporting	Expenditures Reported on SEFA & DCF	Expenditures Not Reported on SEFA & DCF
Project based expenditures	X	
<u>Initial loans</u> issued from State grant (not expenditures from reloaned amounts from revolving loan program income – see program income expenditures below)	X	
Grants to subrecipients	X	
Repayment to the State of unused program income revolving loan grant funds or unused project grant funds		X
Use of dormant program income revolving loan grant funds in accordance with waiver granted by OCD		X
Program income expenditures (revolving loan grant repayments of principal and interest income)		X

(Source: Ohio Development Services Agency, Office of Community Development (OCD))

Beginning with grants awarded in 2014, some entities are now forming partnerships for the Community Housing Impact & Preservation (CHIP) / CDBG grants (with another City, County, etc.). See [Program year \(PY\) 2018 CHIP Partnership Agreement Guidance](#).

- In these partnerships, there is 1 lead entity whose name the grant is in – this is the entity whose SEFA the grant belongs on. All other non-lead partners to the grant are considered vendors/contractors, and therefore the grant does not get reported on their SEFA's.

(Source: Ohio Development Services Agency, Office of Community Development (OCD))

- As for financial statement reporting, you need to consider the potential of a GASB 24 pass-through grant relationship. See AOS Bulletin 2000-008 for further guidance. In addition, for GAAP entities, you should review the grant documents and consider whether a receivable should be booked in accordance with GASB 33.

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Home Investment Partnership Program
Assistance Listing #:	#14.239

This program specific guidance is in addition to the general reporting requirements on page 2.

COVID-19 Funding:

Grant agreements with COVID-19 funding provide information related to the funding source in Attachment A – Scope of Work and Budget. Attachment A includes the “Program Application Type” field which notes the funding is COVID related (e.g. “CDBG CARES”) and the Grant Number field includes grant numbers with a “-4” or “-5” at the end, indicating CARES Act funding (e.g. B-D-20-1DA-4”).

Ohio Development Services Agency, Office of Community Development (OCD) Schedule of Expenditures Reporting Guidance:

- Funding passed through from the Ohio Development Services Agency (ODSA), Office of Community Development (OCD)
- Non-entitlement grant program
 - Reported on the SEFA in accordance with [2 CFR 200.502](#) a
- Not a loan / loan guarantee program as defined in the Uniform Guidance
 - Not reported on the SEFA in accordance with [2 CFR 200.502](#) b & d
- Program income:
 - Loan repayments and interest income are referred to as program income by OCD and the local governments but it is not program income under the Uniform Guidance.
 - Reported by local governments semi-annually and monitored by OCD
 - Must meet block grant requirements in accordance with the signed administrative agreement between the local government and OCD every 3 years
 - OCD may grant waivers for the use of program income funds for alternative purposes.
- If there are material funds on hand with no activity for an extended period of time, auditors will inquire if the activity is reported on the required semi-annual report and verbally recommend the local government (Community) discuss the status of these funds with OCD.
- OCD has requested Community grant recipients include in their SEFA Footnotes the following disclosure:

The current cash balance on “Community’s” local program income account as of “date” is “\$000,000.00”.

Legend:

SEFA = Schedule of Expenditures of Federal Awards

DCF = Data Collection Form

Schedule of Expenditures of Federal Awards (SEFA) Reporting	HOME, Assistance Listing #14.239 (except CHDO)		HOME, Assistance Listing #14,239 CHDO	
	Expenditures Reported on SEFA & DCF	Expenditures <u>Not</u> Reported on SEFA & DCF	Expenditures Reported on SEFA & DCF	Expenditures <u>Not</u> Reported on SEFA & DCF
Project based expenditures	X		X	
Initial loans issued from State grant (not expenditures from reloaned amounts from revolving loan program income – see program income expenditures below)	X		N/A	
Grants to subrecipients	X		N/A	
Repayment to the State of unused program income revolving loan grant funds or unused project grant funds		X		X (Project grant funds)
Use of dormant program income revolving loan grant funds in accordance with waiver granted by OCD		X		N/A
Program income expenditures (revolving loan grant repayments of principal and interest income)		X		N/A

(Source: Ohio Development Services Agency, Office of Community Development (OCD))

Beginning with grants awarded in 2014, some entities are now forming partnerships for the Community Housing Impact & Preservation (CHIP) / CDBG grants (with another City, County, etc.). See [Program year \(PY\) 2018 CHIP Partnership Agreement Guidance](#).

- In these partnerships, there is 1 lead entity whose name the grant is in – this is the entity whose SEFA the grant belongs on. All other non-lead partners to the grant are considered vendors/contractors, and therefore the grant does not get reported on their SEFA's.

(Source: Ohio Development Services Agency, Office of Community Development (OCD))

- As for financial statement reporting, you need to consider the potential of a GASB 24 pass-through grant relationship. See AOS Bulletin 2000-008 for further guidance. In addition, for GAAP entities, you should review the grant documents and consider whether a receivable should be booked in accordance with GASB 33.

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Workforce Innovation and Opportunity Act (WIOA) Cluster
Assistance Listing #:	#17.258 WIOA Adult Program #17.259 WIOA Youth Activities #17.278 WIOA Dislocated Worker Formula Grants

This program specific guidance is in addition to the general reporting requirements on page 2.

ODJFS issues all WIOA funds to the 20 local area fiscal agents. The fiscal agents, in turn, issue sub-awards to various local entities delivering the services including:

- Staff to the local board and the fiscal agent staff who expend WIOA Administrative funds (up to 10 percent of the grant).
- Sub-areas which may include County JFS agencies and non-profits such as county Community Action Agencies
- Youth providers which must be procured competitively by the local board unless the local board opts to designate the CCMEP Lead Agency to carry-out certain permissible activities as defined in WIOA policy letter.
- Optional other sub-recipients such as providers of Adult and Dislocated Worker career services which do not need to be procured competitively

All of the above organizations, if determined to be sub-recipients rather than contractors, must report their federal spending on their SEFA.

Note: Previously under WIA, a single area could hold multiple roles listed above: (i.e. serve as staff to the local board, service provider, and One-Stop Operator (now referred to as Ohio Means Job Center)). The new requirement to procure One-Stop Operators under WIOA and other local board oversight responsibilities led ODJFS to require organizational separation between the staff to the local board and the entities providing services to job seekers and Youth. Because of the need for separation between board staff and service providers, some areas established COGs to employ the local board staff. All new COG's established by a WIOA Area, must complete an analysis to determine who should be reporting the federal funding and receiving the single audit.

See also: <http://emanuals.jfs.ohio.gov/Workforce/WIOA/WIOAPL/WIOAPL-15-18-1.stm>

Reporting WIOA on County Federal Awards Expenditure Schedules

Fiscal agents may disclose the amounts they transmit to other entities in the notes to their federal awards expenditure schedule. However, fiscal agents should not report these amounts as disbursements in their Schedule. (Fiscal agents should only report any amounts they disburse as a WIOA subrecipient in their Schedule). Counties and other entities receiving WIOA from the fiscal agents should report their disbursements as pass-through assistance from their area agency in their federal awards expenditure schedule.

The County or WIOA Area Agency should report federal disbursements for the WIOA Cluster in the workforce development fund. At a minimum, the County or WIOA Area Agency should report the total fiscal year WIOA Cluster disbursements, by program and cluster. The County or WIOA Area Agency should also separate each program by

Administrative and Non-administrative dollars. 2 CFR 200 requires including pass-through numbers (if any) on the Schedule. The ODJFS Director confirmed that a pass through number should be printed on all WIOA awards to local governments. The Schedule should also report the following for the WIOA Cluster:

- Assistance Listing numbers & Grant Titles:
 - #17.258 – WIOA Adult Program
 - #17.259 –WIOA Youth Activities *
 - #17.278 –WIOA Dislocated Worker Formula Grants

- Disbursements for each pass-through number (i.e., cost center), program, and cluster total.

** = OAC section 5101:14-1-01 has named the WIOA Youth program the “Comprehensive Case Management and Employment Program (CCMEP)” which integrates WIOA Youth services with TANF-funded activities at the county (CDJFS) level.*

The US Department of Labor requires an accrual accounting basis for WIOA grant reporting. As a result, Fiscal Agents must report both their disbursements and accruals (i.e. their accrued expenses) for every WIOA funding stream.

- Are they required to have accounting systems that are accrual basis year round?
 - No – 2 CFR 2900.14 explains that a grant recipient is not required to convert its accounting system. Accruals must be reported using best estimates based on analysis of the documentation on hand, even if the entity is not using an accrual accounting system.

- Do they just need to make accrual adjustments to annual/quarterly reports?
 - Yes -- the financial system that all ODJFS sub-recipients use (County Finance Information System or CFIS) allows reporting of both the disbursements and accruals using separate account codes. Traditionally the local areas used spreadsheets or other methods to calculate their accruals and report the total using the accrual account code. New functionality in CFIS launched in June 2016 now automates the accrual calculation for services provided directly to a participant such as classroom training costs, On-the-Job Training, work experience wages, etc. based on the dates of service entered.

- Does the SEFA need to be on accrual basis?
 - No. 2 CFR Part 2900.14 states, in addition to the guidance set forth in 2 CFR 200.328, for Federal awards from the Department of Labor, the DOL awarding agency will prescribe whether the report will be on a cash or an accrual basis. If the DOL awarding agency requires reporting on an accrual basis and the recipient's accounting system is not on the accrual basis, the recipient will not be required to convert its accounting system, but must develop and report such accrual information through best estimates based on an analysis of the documentation on hand.

Thomas DiLisio from the US Department of Labor confirmed on December 8, 2021 that the SEFA is *not* required to be reported on an accrual basis.

ODJFS performs a completeness test of WIOA monies sent by ODJFS with the county and local area agency federal schedules. However, ODJFS tests completeness at the Local Area Agency level. If the auditor wishes to obtain 3rd party confirmations of the WIOA receipts amounts reported on the County's Federal Schedule, audit staff should contact the appropriate Local Area Agency. If the Local Area Agency is included in the County's reporting entity, please contact Sabrina Jamison at (614) 728-1476 or Sabrina.Jamison@jfs.ohio.gov for confirmation of WIOA Monies sent to the County.

(Source: AOS CFAE, Sabrina Jamison, Bureau Chief, Bureau of County Finance and Technical Assistance, ODJFS, Office of Fiscal and Monitoring Services, Sabrina.Jamison@jfs.ohio.gov, and Thomas DiLisio, US Department of Labor 12/08/2021)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Airport Improvement Program
Assistance Listing #:	#20.106

There is no program specific guidance, please follow the general reporting requirements on page 2.

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Highway Planning and Construction Cluster
Assistance Listing #:	#20.205 Highway Planning and Construction (Federal –Aid Highway Program) #20.219 Recreational Trails Program #20.224 Federal Lands Access Program #23.003 Appalachian Development Highway System

This program specific guidance is in addition to the general reporting requirements on page 2.

How to determine when a project should be reported on an LPA’s SEFA

Obtain client’s SEFA, their ledgers, all grant files (including SIB loan agreements, and project agreements), the Tracking Spreadsheet (if they do not utilize their own acceptable method, request they complete ODOT’s spreadsheet mentioned in Section IV of the FACCR), and support for the expenditures.

- For each expenditure made to or on the behalf of an LPA, the **LPA initiates** the payment process. The LPA will prepare an invoice to ODOT requesting payment to a vendor (third-party payment) or the LPA will prepare an invoice to ODOT requesting reimbursement to the LPA. These invoices are approved by signature of the LPA (often signed by the Engineer, the Mayor, or a Commissioner). ODOT will **not** pay a vendor, on behalf of the LPA, without the LPA initiating the payment process of the approved invoice. (see also Audit Bulletin 2000-008 for guidance for on-behalf transactions)
- LPA Administered Project- Unless there is evidence in the project agreement which suggests the project is not funded with Federal money, 100% of these amounts should be reported on the SEFA when payments are made. Invoices submitted to ODOT should be reviewed for inclusion on the SEFA, as they should document the Federal, State, and Local funding sources. When documentation is unclear, the LPA should contact ODOT at DOT.LPAQuestions@dot.ohio.gov for clarification.
- ODOT Administered Projects - Those projects for which ODOT fully administers all phases of the project, the LPA has no further responsibility or input in the project (except for removing and managing possible interferences such as utilities and vehicles, etc.). Therefore, payments on these projects should not be reported on the LPA’s SEFA.
 - Some ODOT projects for which ODOT does not administer every phase of the project, the LPA will administer one or more phases of the project. The Agreement between ODOT and the LPA will provide clarification for which phases are administered by ODOT and which phases are administered by the LPA. This split-administration can make the ODOT projects difficult to understand reporting responsibility and is usually where the Engineer’s Office can provide valuable input and clarification for the auditor. Amounts related to phases that are administered by the LPA should be included on the SEFA when the on-behalf payment is issued by ODOT.
- If an auditor determines the client’s designation of a project as locally-administered vs ODOT-administered is inaccurate, first consult with CFAE via the FACCR inbox and include the documentation/information noted above.
 - Indication of a locally-administered project can often be found in the following sections of the ‘Local-let Project Agreement’
 - Title of agreement – “Local-let Project Agreement’ – indicating that the LPA needs to report for at least 1 phase

- 1.4 – ‘...to establish the responsibilities for the local administration of the project’
 - 4.1 – ‘The LPA and ODOT agree that the LPA is qualified to administer this project....’
 - 4.3 – ‘The LPA shall design and construct the project.....’
- Additionally, situations occur where at the time the grant agreement is written/signed, the LPA plans on a phase, or multiple phases, being locally administered, but later the project changes to being ODOT administered (and vice/versa). When documentation is unclear, the LPA should contact ODOT at DOT.LPAQuestions@dot.ohio.gov for clarification.
 - State Infrastructure Bank (SIB) Loans - SIB loans may be from either Federal funds or State funds. Any ODOT SIB loan using Federal SIB funds (original Federal) are reported on the SEFA. LPAs contact the SIB Administrator (typically through email) to verify if any Federal disbursements occurred on their SIB loans during the year. If there were, the SIB Administrator sends them the dollar amount. The SIB Administrator doesn’t automatically send this information out to LPAs, but the ODOT SIB has the capability to provide it if requested.
 - PID’s using a “Task Order Consultant” – Occasionally, an LPA chooses to utilize an ODOT Task Order Consultant to handle certain phases of the project for them (as indicated in their Scope of Services agreement). When this occurs, the LPA should NOT be reporting the expenditures related to the Task Order phases on their SEFA (as those will be reported on ODOT’s SEFA and would follow guidance as if they were ODOT administered). The invoices for these services are not initiated by the LPA, nor are the invoices approved by the LPA. All invoicing is initiated and approved by ODOT personnel.
 - While the SEFA must show the identifying number assigned by the pass-through entity (i.e., PID number), the identifying numbers can be reported in 1 line on the SEFA. While ODOT prefers each PID to be reported individually on the SEFA, it historically has not been included in the grant terms and conditions. LPA’s should review their grant agreements for requirements from ODOT. Auditors should not propose adjustments to the SEFA to report the amounts individually unless it is a requirement in the grant terms and conditions. (ODOT has indicated some project agreements now require this, so Auditors should determine if there was appropriate compliance with the agreement’s terms).
 - Note: Lack of compliance with this ODOT contract requirement would not be considered non-compliance with UG.

(Source: [CFAE, Michael Miller, ODOT Office of External Audits, on 3/21/2022](#), and [ODOT SEFA Guidance for LPAs](#))

Determination of Payment Date for SEFA Reporting

If the LPA prepares a cash-basis SEFA, for the 2019 fiscal year end and thereafter, the ODOT Office of External Audits (OEA) has been directing LPA subrecipients to use the State of Ohio’s Warrant Date for SEFA reporting for transactions where the LPA reviews and approves the contractor’s invoice and then forwards that invoice to ODOT for the State to make a direct payment to the contractor.

Most Ohio local governments have elected to prepare their SEFAs using the cash-basis of accounting. Therefore, since they are using the cash-basis, for those transactions where the LPA reviews the contractor’s/vendor’s invoice and then forwards the invoice to ODOT so that the State issues a direct payment to the contractor/vendor, the LPA must use the State of Ohio Warrant Date to assign that transaction to a fiscal year for SEFA reporting. The use of any other date field may result in transactions of this type being assigned to the wrong fiscal year. So, for cash-basis SEFA preparers, for transactions of this type, the use of the State of Ohio Warrant Date is required.

Also, for cash-basis SEFA preparers, when the LPA issues a payment to the contractor for the Federal share and is subsequently reimbursed by ODOT, for these transactions the LPA must use the check date, not the date ODOT issued the reimbursement payment. Furthermore, for cash-basis SEFA preparers, for Federally reimbursed labor

costs that originate with the LPA, the LPA should use the dates the corresponding payroll was paid, not the date of ODOT's reimbursement payment.

Finally, there is a Capital Program Payments Report available from ODOT's [Construction Management Reporting System](#) (CMRS). That report can be used to confirm State of Ohio Warrant Dates. However, as Federal, State and/or Local funds disbursed by ODOT may be commingled/combined in the Warrant or EFT, this report **cannot** be used to verify the disbursement of specific Federal funds amounts. This issue is one of the primary reasons for the Notice which appears on page one of the reports and the watermark which appears on every page. A different LPA source document must be used to confirm the Federal funds portion of the payment

(Source: [AOS CFAE](#) and [ODOT SEFA Guidance for LPAs](#))

Other Agreements

ODOT and LPAs may enter into agreements involving Federal 20.205 funds that may need to be included on the LPA's SEFA but may not have ODOT specific requirements addressed fully in the FACCRs. Auditors should refer to these agreements to determine what is required to be reported on the LPA's SEFA. Examples of these agreements include:

- CEAO SAFETY STUDY LPA PROJECT AGREEMENT
- CEAO SHV LPA PROJECT AGREEMENT
- CEAO SIGN UPGRADE LPA PROJECT AGREEMENT
- LPA DERG PROJECT AGREEMENT
- LPA DERG P-P-P PROJECT AGREEMENT
- LPA TOWNSHIP SIGNAGE UPGRADE PROJECT AGREEMENT
- SRTS NON-INFRASTRUCTURE PROJECT AGREEMENT

(Source: [CFAE](#) and [Michael Miller, ODOT Office of External Audits, on 3/21/2022](#))

Programs which may include Highway Planning and Construction Cluster Funding

Metropolitan Planning Organization (MPO) Projects

MPO projects are governed by a biennial MPO agreement and an annual work program funding. ODOT reimburses the MPO for costs claimed that are eligible under the work program. Though the MPO Agreement covers two years, funding authorizations occur on an annual basis.

(Source: [Michael Miller, ODOT Office of External Audits, on 3/21/2022](#))

Ohio Municipal Bridge Program

The Municipal Bridge Program provides Federal funds to municipal corporations and Regional Transit Authorities (RTA) for roadway bridge replacement, bridge rehabilitation, or bridge demolition projects. A funding limit of \$2 million per project has been established. Funding awarded through this program may not be used in conjunction with funding awarded through the Ohio Bridge Partnership Program.

(Source: [Municipal Bridge Program and Guidance](#))

Local Major Bridge Program

The Local Major Bridge Program provides Federal funds to counties and municipal corporations for bridge replacement, major bridge rehabilitation, and bridge demolition projects. Bridge replacement and bridge rehabilitation projects will be given a higher priority in funding consideration than bridge demolition projects.

(Source: [Local Major Bridge Program and Guidance](#))

Small City Program

The Small City Program provides Federal funds to small cities with populations from 5,000 to 24,999 that are NOT located within Metropolitan Planning Organizations' boundaries. Currently there are 54 small cities that meet this program's criteria. A listing of the eligible cities that meet the program's criteria can be found on the Local Programs website at:

<https://transportation.ohio.gov/static/Programs/LocalPrograms/SmallCity/EligibleSmallCities.pdf>

(Source: [Small City Program and Guidelines](#))

See also ODOT guidance in the [ODOT SEFA Guidance for LPAs](#) and other resources at: <http://www.dot.state.oh.us/Divisions/Finance/Auditing/Pages/LocalPublicAgencies-LPA.aspx>

Reporting Summary

Note: This table is greatly simplified. Auditors should also carefully consider all other guidance in this document and the FACCR as well as any other grant-specific documentation provided by the client in order to correctly determine proper reporting of associated activities.

	Project Adminstered by:			
	ODOT (no match)	ODOT (LPA match)	Both	LPA
Report on SEFA	No	No	only LPA admin.	Yes
Capital Asset: During Construction	No	No	Yes - CIP for on-behalf, reimbursed, or direct expenditures	Yes - CIP for on-behalf, reimbursed, or direct expenditures
Capital Asset: After Completion	Yes - Total cost provided by ODOT	Yes - Total cost provided by ODOT	Yes	Yes

Footnotes:

1. Administered by Both: Some projects have phases administered by ODOT and some phases administered by LPAs. This column is meant to address those projects.
2. SIB Loans: **Auditors should contact CFAE any time there are SIB loans involved.**
3. If a task order consultant is used for any project, the amount should not be reported on the LPA SEFA.
4. Reporting of on-behalf activity (related to ODOT administered projects), capital assets/infrastructure, and/or construction in progress require careful consideration of many various resources and guidance publications. Efforts have been made to arrive at a consensus for proper reporting of these items; however, there are still matters up for debate. To that end, auditors should consider all available information in order to make a judgment decision for each scenario they come across. Continued efforts are being made in this matter, and guidance should be expected in the future.

(Source: [CFAE](#) and [Michael Miller, ODOT Office of External Audits, on 3/21/2022](#))

Auditors should bear in mind that ODOT grants are often approved long before actual work takes place on the related project and funded by on-behalf payments, making these projects difficult to track and properly report, particularly for SEFA purposes. Auditors should take care to note not only the approval of ODOT grants and projects, but also when the work is anticipated to take place and the assistance listing number. For AOS auditors,

projects with anticipated future start dates should be noted in Matters for Attention (and carried forward) to make subsequent auditors aware of the project and possible funding to be included on the SEFA.

(Source: **CFAE**)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Federal Transit Cluster
Assistance Listing #:	#20.500 Federal Transit – Capital Investment Grants (Fixed Guideway Capital Investment Grants) #20.507 Federal Transit – Formula Grants (Urbanized Area Formula Program) #20.525 State of Good Repair Grants Program #20.526 Bus and Bus Facilities Formula & Discretionary Programs (Bus Program)

There is no program specific guidance, please follow the general reporting requirements on page 2.

YEAR ENDED:	2021
FEDERAL AWARD NAME:	State and Community Highway Safety
Assistance Listing #:	#20.600

This program specific guidance is in addition to the general reporting requirements on page 2.

This program does not currently have a CFAE-prepared FACCR available; however, it is a Federal grant program and the Ohio Department of Public Safety (*not* ODOT) is the pass-through entity for most Ohio local governments.

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Minimum Penalties for Repeat Offenders for Driving While Intoxicated
Assistance Listing #:	#20.608

This program specific guidance is in addition to the general reporting requirements on page 2.

This program does not currently have a CFAE-prepared FACCR available; however, it is a Federal grant program and the Ohio Department of Public Safety (*not* ODOT) is the pass-through entity for most Ohio local governments.

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Coronavirus Relief Funds
Assistance Listing #:	21.019

This program specific guidance is in addition to the general reporting requirements on page 2.

Many entities are designing and implementing programs to share CRF funding with other governments, small businesses, not-for-profits, etc. in order to assist with relief efforts in areas with the most need. Additional information regarding the sources of CRF funding can be found here - https://ohioauditor.gov/resources/covid19/CRF_Flowcharts_Funding.pdf.

While funding for CRF via House Bills 481 and 614 were distributed to local governments through the County Auditor/Fiscal Officer, the County is NOT considered a pass-through entity in these situations and the disbursements to local governments should NOT be reported on a County SEFA. Example SEFAs for small governments (Townships, Villages, and Libraries) are provided at https://ohioauditor.gov/resources/covid19/Small_Govt_Example_SEFAs.pdf.

Since the various sources of the CRF program are all part of the Assistance Listing #21.019 and are all treated as one program for major program determination, only one opinion on compliance will be issued using the results of testing in the FACCR.

Subrecipients, Contractors, and Beneficiaries:

Auditors must carefully consider the Coronavirus Relief Fund (CRF) agreements in regards to treatment for SEFA reporting, including evidence indicating subrecipient, contractor, and/or beneficiary relationships between governments.

[2 CFR 200.331](#) includes guidance related to Subrecipients and Contractors in (a) and (b), respectively. Additionally, this section of the UG clarifies “the pass-through entity must make case-by-case determinations whether each agreement it makes for the disbursement of Federal program funds casts the party receiving the funds in the role of a subrecipient or a contractor.” However, the UG additionally notes, “In determining whether an agreement between a pass-through entity and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement.”

Furthermore, the CARES Act through CRF funding has introduced the concept of organizations as “beneficiaries” in addition to the two categories above. While not addressed in UG, the U.S. Department of the Treasury’s Coronavirus Relief Fund Guidance as published in the Federal Register on January 15, 2021 contains the following in section B. Questions Related to Administration of Fund Payments:

13. What are the differences between a subrecipient and a beneficiary under the Fund for purposes of the Single Audit Act and 2 CFR part 200, subpart F regarding audit requirements?

The Single Audit Act and 2 CFR part 200, subpart F regarding audit requirements apply to any non-federal entity, as defined in 2 CFR 200.69, that receives payments from the Fund in the amount of \$750,000 or more. Nonfederal entities include subrecipients of payments from the Fund, including recipients of transfers from a State, territory, local government, or tribal government that received a payment directly from Treasury. However, subrecipients would not include individuals and organizations (e.g., businesses, non-profits, or educational institutions) that are beneficiaries of an assistance program established using payments from the Fund. The Single Audit Act and 2 CFR part 200, subpart F regarding audit requirements do not apply to beneficiaries.

Unlike subrecipient payments which are recorded in a separate column on the SEFA, payments to contractors and beneficiaries are NOT reported separately on the SEFA but should be reported as expenditures of the non-federal entity making those disbursements. Auditors should evaluate these relationships carefully when considering expenditures reported on the SEFA.

Timing of Reporting Expenditures

As a general rule, expenditures should be recognized on the SEFA in the year they are incurred (i.e., when the underlying goods received and/or services rendered) regardless of when they are eventually reimbursed. Encumbrances do not count as expenditures since the goods have not been received yet and the services not rendered. Whether local governments should report the expenditure at the time of obligation or time of cash payment is dictated by the accounting basis the local government uses to prepare its SEFA. Most local governments prepare their SEFA on the cash basis of accounting. If cash basis is used, the SEFA should recognize the expenditure when the cash payment is made.

Additional SEFA Reporting Details

On June 18, 2020, OMB issued Memo 20-26 which states all recipients and subrecipients must separately identify the COVID-19 Emergency expenditures on the SEFA and any audit report findings. While the guidance from OMB does not specifically illustrate how this identification must be presented, the following is a possible example:

Program Title/Project Number/Subrecipient Name	Grant/Project Number	CFDA Number	Awards Amount	Expenditures
Clusters:				
Child Nutrition Cluster - U.S. Department of Agriculture - Passed through the State Department of Education:				
Noncash Assistance (Commodities) -				
National Lunch Program Bonus Commodities 2019-20	N/A	10.555	\$ 93,034	\$ 93,034
Cash Assistance:				
National School Lunch Program 2018-19	191960	10.555	752,609	89,674
National School Lunch Program 2019-20	201960	10.555	447,046	447,245
COVID-19 - Unanticipated School Closures 2019-20	200902	10.555	313,953	313,953
National School Lunch Program (incl. commodities) Subtotal		10.555	1,606,642	943,906
National School Breakfast Program Subtotal		10.553	645,112	291,157
Summer Food Service Program Subtotal		10.559	44,224	25,734
Total Child Nutrition Cluster			2,295,978	1,260,797

Additional SEFA and Footnote resources, including SEFA shells, are available for AOS Staff in the Audit Employees Briefcase and on the [IPA Resource Internet Page](#).

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Emergency Rental Assistance Program
Assistance Listing #:	#21.023

There is no program specific guidance, please follow the general reporting requirements on page 2.

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Coronavirus State and Local Fiscal Recovery Funds
Assistance Listing #:	#21.027

This program specific guidance is in addition to the general reporting requirements on page 2.

When Treasury initially issued State and Local Fiscal Recovery Funds (SLFRF) to recipients, to expedite payments and meet statutory timelines the funding was issued under the same Assistance Listing Number (AL #) as the Coronavirus Relief Fund (21.019). Treasury subsequently clarified that SLFRF funding should be reported under AL # 21.027. Auditors should be aware that some SLFRF grant agreements may reflect AL # 21.019; however, the funding should be reported under AL #21.027. See also the [SLFRF Compliance and Reporting Guidance](#) for further guidance.

Further, auditors should be aware that SLFRF may be used for general government services up to the amount of revenue loss (either as calculated by the entity or up to the standard \$10 million allowance). The total amount of revenue loss is not reported on the SEFA; rather, entities report revenue loss dollars when expended on allowable general government services.

(Source: **CFAE**)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Emergency Connectivity Fund Program (ECF)
Assistance Listing #:	#32.009

This program specific guidance is in addition to the general reporting requirements on page 2.

The Emergency Connectivity Fund is a reimbursement-basis program administered by the Federal Communications Commission (FCC). The FCC allows for two reimbursement methods:

- Billed Entity Applicant Reimbursement (BEAR) in which the entity pays the vendor and subsequently seeks reimbursement from the FCC.
- Service Provider Invoicing (SPI) in which the service provider invoices the FCC directly for program expenditures.

Expenditures should be reported on the SEFA based on the date the expenditure is made for the goods/services regardless of the reimbursement method used (i.e. BEAR or SPI method). If SPI, the government needs to work with the service provider to determine the date paid.

Auditors should be aware that the FCC provides decision letters and commitment decision letters to entities as a part of project approvals. Those letters do not necessarily dictate when expenditures are recorded on the SEFA, expenditures should be reported when actually paid. However, the decision letters and commitment decision letters may impact SEFA reporting if the approval process and expenditures span more than one fiscal year. For instance, if a government plans to seek reimbursement for expenditures paid in October 2021 but doesn't receive a decision letter until early 2022, then as of December 31, 2021 the grant isn't executed and the expenditures wouldn't be reported on the SEFA. In that case, the government should refer to the [Prior Fiscal Year Expenditure Advisory Memo](#).

For financial reporting purposes, entities subject to ORC 5705.09, .12, .14, and/or .16 are required to establish a separate special revenue fund to track grant activity. Note that most libraries are not subject to these ORC sections so they have more flexibility as to how they track grant activity; however, they are still subject to Federal requirements for separate accountability.

Governments should record receipts when received and expenditures when paid in their ledgers. For on-behalf (SPI) activity, the receipt and related expenditures should be recorded as memo entries when the service provider executes the payment (or issues a credit).

For GAAP statements, governments need to determine whether the grant is executed as of fiscal year-end and the decision letter and/or commitment decision letter would indicate that the grant is executed. When the letters and project expenditures straddle fiscal years, there may be situations where 2021 expenditures would be recorded in 2022 if the decision letter and/or commitment decision letter was received in 2022. If the grant is executed, a receivable should be recorded only to the extent that allowable costs have been incurred but not reimbursed at year-end. The receivable should be offset by deferred inflows or revenue based on the government's revenue recognition period. In the rare case that any dollars are received prior to being expended, they would be recorded as unearned revenue.

(Source: [CFAE](#))

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Capitalization Grants for Clean Water State Revolving Funds
Assistance Listing #:	66.458

This program specific guidance is in addition to the general reporting requirements on page 2.

Since FY 2010, Ohio EPA (OEPA) has determined each year if they can implement the alternative single audit approach for the 66.458 & 66.468 programs (which is described further in each of these FACCRs). OEPA has notified us of their fiscal year 2021 single audit program determination for USEPA State Revolving Loan (SRF) Local Government Agency (LGA) recipients. OEPA determined that it can apply the alternative approach to FY 2021.

When total federal assistance expenditures exceed \$750,000, auditors should apply the following guidance:

- Assistance Listing 66.458 (Cleaning Water Revolving Fund)
 - As a reminder, auditors must continue to subject the selected fiscal year 2010-2016 LGAs/project to single audit for the remaining lives of those projects, where total Federal financial assistance expenditures exceed \$750,000.
 - During FY 2016, OEPA did not execute any loan agreements for this program. Loans are executed by program year and capitalization grant.
 - The projects in **highlight** below are no longer required to be reported as they have completed their disbursements.

First FY Subject to Single Audit *	LGA	Account ID	EPA ID	Loan Award Date
2014	City of Toledo	6839	CS390915-0110	11/19/2014
2016	None.	See note above.		
2017	Northeast Ohio Regional Sewer District	7780	CS391430-0130	8/30/2017
2018	Northeast Ohio Regional Sewer District	8051	CS394130-0139	4/26/2018
2019	City of Akron (WRF BioCEPT)	8540	CS390095-0172	06/27/2019
2019	City of Nelsonville (Regional Collection System)	8689	CS390649-0017	11/13/2019

<u>2020</u>	<u>City of Akron – WRF Headworks Improvement</u>	<u>8727</u>	<u>CS390095-0163</u>	<u>1/30/2020</u>
<u>2020</u>	<u>Northeast Ohio Regional Sewer District</u>	<u>9133</u>	<u>CS391430-0168</u>	<u>12/11/2020</u>
<u>2021</u>	<u>City of Columbus</u>	<u>9137</u>	<u>CS390274-0362</u>	<u>2/5/2021</u>

As mentioned above, once a project is identified for Single Audit under the Alternative Audit approach, it is required to be subject to a single audit *for the life of the project* in any year where the LGA's total Federal financial assistance exceeds \$750,000. This means that the LGA is required to report the WPCLF program on its SEFA annually, where subject to Single Audit, until the project is completed.

The projects listed above are the minimum that must be reported. If these entities chose to report all loans on their federal schedule there is no need to issue adjustments or citations.

Auditors can use various reports available at <http://loans.owda.org/> to obtain loan summaries, loan transaction detail, disbursement detail, and audit confirmations for all projects undertaken for each recipient.

(Source: OEPA, 4/4/2022)

Subrecipients

CWSRF amounts are awarded by EPA to states as grants. The states then makes subawards in the form of loans to its subrecipients. Therefore, in determining the amount of federal funds expended to be reported on the Schedule of Expenditures of Federal Awards (SEFA), subrecipients receiving CWSRF loans should include project expenditures incurred under these loans during the audit period as provided in 2 CFR section 200.502(a). These are subawards— not direct federal loans—and, therefore, neither 2 CFR sections 200.502(b) nor (d) apply when calculating the amount of federal funds expended.

It also is important to appropriately identify these CWSRF loans as subawards because of the impact on which federal agency is the cognizant or oversight agency. When completing the Form SF-SAC (also referred to as the Data Collection Form for Reporting on Audits of States, Local Governments and Non-profit Organizations, OMB Form 0348-0057), the subrecipient should indicate that a CWSRF loan received from the state is not a direct award by showing an “N” in Part III, Item 6(h).

Equivalency

Equivalency projects/loans are funded with an amount equal to the capitalization grant and reported in the OMB Federal Funding Accountability and Transparency Act (FFATA) Subaward Reporting System. These projects/loans are considered to be federal projects/loans. To achieve consistency in meeting program requirements and eliminate the possibility of over-reporting information under FFATA, equivalency projects/loans must meet all equivalency requirements: federal cross-cutters, single audit, architectural and engineering (A/E) procurement, disadvantage business enterprise (DBE), and signage.

While any of the sources of funds in the CWSRF may be used for equivalency projects/loans, it should be understood that these funds would be considered federal funds and that all disbursements for equivalency projects/loans must be entered into SEFA.

(Source: 2021 OMB Compliance Supplement, Part 4, CWSRF Cluster)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Capitalization Grants for Drinking Water State Revolving Funds
Assistance Listing #:	66.468

This program specific guidance is in addition to the general reporting requirements on page 2.

Since FY 2010, Ohio EPA (OEPA) has determined each year if they can implement the alternative single audit approach for the 66.458 & 66.468 programs (which is described further in each of these FACCRs). OEPA has notified us of their fiscal year 2021 single audit program determination for USEPA State Revolving Loan (SRF) Local Government Agency (LGA) recipients. OEPA determined that it can apply the alternative approach to FY 2021 for both 66.458 & 66.468.

- As a reminder, auditors must continue to subject the selected fiscal year LGAs/projects to single audit for the remaining lives to those projects, where total Federal financial assistance expenditures exceed \$750,000.
- During **2014, 2017, and 2021** OEPA did not execute any loan agreements. Loans are executed by program year and capitalization grant.
- Projects with **highlight** below are closed.

First FY Subject to Single Audit *	LGA	Account ID	EPA ID	Loan Award Date
2013	City of Westerville	6478	FS390974-0004	6/27/2013
2016	City of Columbus	7187	FS390274-0209	1/6/2016
		7188	FS390274-0195	1/6/2016
		7260	FS390274-0208	3/11/2016
2016	City of Oregon	7265	FS390721-0018	3/11/2016
2017	NONE	See note above		
2018	City of Columbus	7992	FS390079-0238	3/29/2018
2018	Trumbull County	8052	FS390079-0036	4/26/2018
2018	Saint Mary's	8104	FS390825-0003	09/06/2018
2019	City of Toledo	8229	FS390915-0123	10/16/2018
2020	City of Columbus	8884	FS390274-0313	05/07/2020
2021	NONE	See note above		

* - As mentioned above, once a project is identified for Single Audit under the Alternative Audit approach, it is required to be subject to a single audit *for the life of the project* in any year where the LGA's total Federal financial assistance exceeds \$750,000. This means that the LGA is required to report the WSRLA program on its SEFA annually, where subject to Single Audit, until the project is completed.

** The projects listed above are the minimum that must be reported. If these entities chose to report all loans on their federal schedule there is no need to issue adjustments or citations.

Auditors can use various reports available at <http://loans.owda.org/> to obtain loan summaries, loan transaction detail, disbursement detail, and audit confirmations for all projects undertaken for each recipient.

Reminder: Even though entities receive these programs as loans from OEPA. OEPA receives this as grant from the federal government. Therefore, the local entities should NOT report these programs as loans on their SEFA.

(Source: OEPA, 4/4/2022)

Subrecipients

DWSRF amounts are awarded by EPA to states as grants. The states then make subawards in the form of loans to their subrecipients. Therefore, in determining the amount of federal funds expended to be reported on the Schedule of Expenditures of Federal Awards (SEFA), subrecipients receiving DWSRF loans should include project expenditures incurred under these loans during the audit period as provided in 2 CFR section 200.502(a). These are subawards— not direct federal loans—and, therefore, neither 2 CFR sections 200.502(b) nor (d) apply when calculating the amount of federal funds expended.

It also is important to appropriately identify these DWSRF loans as subawards because of the impact on which federal agency is the cognizant or oversight agency. When completing the Form SF-SAC (also referred to as the Data Collection Form), the subrecipient should indicate that a DWSRF loan received from the state is not a direct award by showing an "N" in Part III, Item 6(h).

Equivalency

To achieve consistency in meeting program requirements and eliminate the possibility of over-reporting information under the Federal Funding Accountability and Transparency Act (FFATA), state DWSRF programs must use the same group of loans for the purpose of meeting federal cross-cutting, single audit, procurement, and Transparency Act reporting requirements (as per 40 CFR 35.3575). Equivalency projects/loans are funded with an amount equal to the capitalization grant. DWSRF set-aside activities are also considered federal expenditures. Auditors should be mindful that set-aside spending will not always trigger FFATA reporting based on the thresholds for reporting under the law. In addition, for states using the loan authority under the set-aside funds, it is possible those expenditures are repayment dollars from previous loans and should not be considered federal funds. Auditors should consult with the state to make that determination.

While any of the sources of funds in the DWSRF may be used for equivalency projects/loans, it should be understood that these funds would be considered federal funds once they are deemed equivalency dollars and that all disbursements for equivalency projects/loans must be entered into the SEFA. The SEFA should reflect equivalency dollars rather than actual cash draws from the Treasury to the state. Additionally, the SEFA will differ from the SF-425 form.

(Source: 2021 OMB Compliance Supplement, Part 4, Environmental Protection Agency, DWSRF Cluster)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Student Financial Assistance Cluster
Assistance Listing #:	#84.007 Federal Supplemental Educational Opportunity Grants (FSEOG) #84.063 Federal Pell Grant Program (PELL) #84.268 Federal Direct Student Loans (DIRECT LOAN)
Note:	<p>The Student Financial Aid Cluster also contains the following programs; however, these are not likely to occur at most local schools. If they occur, they are not likely to be material to the cluster. If you need to test one of the following programs, refer to Part 5 of the OMB Circular Compliance Supplement and AOS Auditors contact CFAE using the FACCR Specialty in Spiceworks (IPA use the FACCR Inbox).</p> <p>#84.033 Federal Work-Study Program (FWS)</p> <p>#84.038 Federal Perkins Loan Program (FPL) – Federal Capital Contributions</p> <p>#84.379 Teacher Education Assistance For College And Higher Education Grants (TEACH Grants)</p> <p>#84.408 Postsecondary Education Scholarships for Veteran’s Dependents (Iraq and Afghanistan Service Grants) (IASG))</p> <p>#93.264 Nurse Faculty Loan Program (NFLP)</p> <p>#93.342 Health Professions Student Loans, Including Primary Care Loans and Loans for Disadvantaged Students (HPSL/PCL/LDS)</p> <p>#93.364 Nursing Student Loans (NSL)</p> <p>#93.925 Scholarships for Health Professions Students from Disadvantaged Backgrounds – Scholarships for Disadvantaged Students (SDS)</p>

This program specific guidance is in addition to the general reporting requirements on page 2.

If the SFA Cluster is part of the major program being audited, both of these loan programs must also be audited as part of the SFA Cluster.

Auditors should note that, even though student loans under the Direct Loan Program (Assistance Listing 84.268) are made to students (not the institution of higher education), under this loan program, auditors must include the value of loans made to students during the audit period as Federal awards expended under the SFA Cluster in the Schedule of Expenditures of Federal Awards (SEFA). (See [2 CFR Section 200.502\(c\)](#)) Also, if the entity is administering the Federal Perkins Loan (FPL) Program (Assistance Listing 84.038), it retains a Perkins Revolving Loan fund. The entire amount in that fund, including outstanding FPL loans to students, must be included as Federal awards expended in the SEFA.

NOTE: Legacy cash reports are available to schools and their auditors to aid in preparation of the SEFA. A link to the Web-GAAP wiki is provided on our intranet page under the auditor resources tab. Keep in mind that district use of Web-GAAP is not mandatory and some districts may not utilize these reports. Any SEFA format is acceptable so long as it complies with the requirements above and those of 2 CFR Section 200.510(b).

Auditors should refer to AOS Bulletin 2009-002, Reporting Federal Student Loans – Adult Education, for accounting and reporting guidance on the SFA Cluster. While this bulletin references pre-UG guidance instead of UG since those were the requirements in place at the time the bulletin was written; the guidance is still accurate.

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Title I Grants to Local Educational Agencies
Assistance Listing #:	#84.010

This program specific guidance is in addition to the general reporting requirements on page 2.

NOTE: Legacy cash reports are available to schools and their auditors to aid in preparation of the SEFA. A link to the Web-GAAP wiki is provided on our intranet page under the auditor resources tab. Keep in mind that district use of Web-GAAP is not mandatory and some districts may not utilize these reports. Any SEFA format is acceptable so long as it complies with the requirements above and those of 2 CFR 200.510(b).

(Source: CFAE)

The Ohio Department of Education has been granted a waiver by the US Department of Education which permits a Local Education Agency (LEA) to carryover greater than 15% of Title I funds once every three years (section 1127(b) of the ESEA).

**(Source: ODE CCIP note #310-
<https://ccip.ode.state.oh.us/documentlibrary/ViewDocument.aspx?DocumentKey=78674>)**

CARES Act provides the following flexibility with regards to Title I, Part A Fiscal Year 2019 Carryovers:

Title I, Part A Carryover limitation for Federal fiscal year (FY) 2019. This waives the requirement that limits a State Education Agency's (SEA) ability to grant to its Local Education Agencies (LEAs) a waiver of the 15 percent Title I, Part A carryover limitation in section 1127(a) more than once every three years.

(Source: ODE CARES Act CCIP Note #432)

Since schoolwide programs are not separate federal programs, as defined in 2 CFR section 200.42, expenditures of federal funds consolidated in schoolwide programs should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the SEFA. A footnote showing, by program, amounts consolidated in schoolwide programs is encouraged.

(Source: 2021 OMB Compliance Supplement Department of Education Crosscutting Procedures)

Transferability

Expenditures of funds transferred from one program to another should be included in the total expenditures of the receiving program for purposes of (1) determining Major programs and (2) completing the SEFA.

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Special Education Cluster (IDEA)
Assistance Listing #:	#84.027 Special Education – Grants to States (IDEA, Part B) #84.173 Special Education – Preschool Grants (IDEA Preschool)

This program specific guidance is in addition to the general reporting requirements on page 2.

ODE informed us OAKS is not currently assigning pass-through numbers. Because ODE may reinstate pass-through numbers in the future, we suggest districts continue to create special cost centers within their funds to separately summarize amounts for each fiscal year.

(Source: ODE)

NOTE: Legacy cash reports are available to schools and their auditors to aid in preparation of the SEFA. A link to the Web-GAAP wiki is provided on our intranet page under the auditor resources tab. Keep in mind that district use of Web-GAAP is not mandatory and some districts may not utilize these reports. Any SEFA format is acceptable so long as it complies with the requirements above and those of 2 CFR 200.510(b).

(Source: AOS CFAE)

6B IDEA Restoration and Preschool Restoration:

ODE revised the IDEA-B 611 school-age and IDEA-B 619 preschool allocation methodology to be in compliance with federal regulations. LEAs that received underpayments in prior years received additional restorative funds in a new CCIP funding application in SFY 2019 and/or SFY 2020. Restoration funds were allocated to LEAs in SFY19 and/or SFY20 as intended, and no new awards were made in SFY21. Funds awarded in prior years could be carried forward and spent as carryover in SFY21 through Sept 30, 2021.

The Restoration funds should be included as part of the Special Education Cluster on the Federal Schedule.

(Source: ODE)

The Office for Exceptional Children, Resource Management Section has provided a listing of the FY21 Project funds recipients (See Excel Spreadsheet linked below), showing the fiscal and contact information for each entity that was awarded Parent Mentor Project funds.

The [Excel Spreadsheet](#) distinguishes between entities that received Parent Mentor Project funds through the State GRF funds or through Federal Flow-through funds.

The website administrator for the Parent Mentor program changed mid-year. The website (no longer active) hosted by the Ohio Coalition for the Education of Children with Disabilities (CECD) is located at <https://www.ocecd.org/ParentMentorsofOhio.aspx>. The current active website hosted by the Center on Education and Training for Employment at The Ohio State University can be located at <https://parentmentor.osu.edu/>.

(Source: Ohio Department of Education Office for Exceptional Children / e-mail from Joe Petrarca)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Career and Technical Education – Basic Grants to States (Perkins V)
Assistance Listing #:	#84.048

This program specific guidance is in addition to the general reporting requirements on page 2.

ODE informed us OAKS is not currently assigning pass-through numbers. Because ODE may reinstate pass-through numbers in the future, we suggest districts continue to create special cost centers within their funds to separately summarize amounts for each fiscal year.

(Source: ODE)

NOTE: Legacy cash reports are available to schools and their auditors to aid in preparation of the SEFA. A link to the Web-GAAP wiki is provided on our intranet page under the auditor resources tab. Keep in mind that district use of Web-GAAP is not mandatory and some districts may not utilize these reports. Any SEFA format is acceptable so long as it complies with the requirements above and those of 2 CFR 200.510(b).

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Charter Schools
Assistance Listing #:	#84.282A

This program specific guidance is in addition to the general reporting requirements on page 2.

NOTE: This program does not currently have a CFAE-prepared FACCR available, however, **it is a Federal Grant program (NOT a state grant)** administered by the U.S. Department of Education and passed through the Ohio Department of Education (ODE) that **should be included in the SEFA for entitles receiving the grant.**

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Twenty-First Century Community Learning Centers
Assistance Listing #:	#84.287

This program specific guidance is in addition to the general reporting requirements on page 2.

ODE informed us OAKS is not currently assigning pass-through numbers. Because ODE may reinstate pass-through numbers in the future, we suggest districts continue to create special cost centers within their funds to separately summarize amounts for each fiscal year.

(Source: ODE)

Since schoolwide programs are not separate federal programs, as defined in 2 CFR section 200.42, expenditures of federal funds consolidated in schoolwide programs should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the SEFA. A footnote showing, by program, amounts consolidated in schoolwide programs is encouraged.

(Source: 2021 OMB Compliance Supplement Department of Education Crosscutting Procedures)

NOTE: Legacy cash reports are available to schools and their auditors to aid in preparation of the SEFA. A link to the Web-GAAP wiki is provided on our intranet page under the auditor resources tab. Keep in mind that district use of Web-GAAP is not mandatory and some districts may not utilize these reports. Any SEFA format is acceptable so long as it complies with the requirements above and those of 2 CFR 200.510(b).

Transferability

Expenditures of funds transferred from one program to another should be included in the total expenditures of the receiving program for purposes of (1) determining Major programs and (2) completing the SEFA.

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	School Improvement Grants/School Quality Improvement Grants
Assistance Listing #:	#84.377

This program specific guidance is in addition to the general reporting requirements on page 2.

Funds under the previous School Improvement Grant awarded by USDOE should be shown as a separate award under Assistance Listing 84.377A. These expenditures may still be seen in FY20 and FY21.

Under ESSA, School Improvement Grants are not reported as a separate program and are included as a set-aside in Title I.

[\(Source: ODE\)](#)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Supporting Effective Instruction State Grants
Assistance Listing #:	#84.367

This program specific guidance is in addition to the general reporting requirements on page 2.

Funds under the Small, Rural School Achievement (SRSA) Program (Assistance Listing 84.358A) may be used for activities allowed under other programs, including this program Title II, Part A. Expenditures for allowable activities under Title II, Part A from funds awarded for the SRSA Funds Program should be included in the audit universe and total expenditures of Assistance Listing 84.358A (i.e., from the program from which they originated) for purposes of (1) determining Type A programs, and (2) completing the Schedule of Expenditures of Federal Awards (SEFA).

(Source: 2021 OMB Compliance Supplement Department of Education AL: 84.367 Supporting Effective Instruction State Grant Procedures)

ODE informed us OAKS is not currently assigning pass-through numbers. Because ODE may reinstate pass-through numbers in the future, we suggest districts continue to create special cost centers within their funds to separately summarize amounts for each fiscal year.

(Source: ODE)

Since schoolwide programs are not separate federal programs, as defined in 2 CFR section 200.42, expenditures of federal funds consolidated in schoolwide programs should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the SEFA. A footnote showing, by program, amounts consolidated in schoolwide programs is encouraged.

(Source: 2021 OMB Compliance Supplement Department of Education Crosscutting Procedures)

NOTE: Legacy cash reports are available to schools and their auditors to aid in preparation of the SEFA. A link to the Web-GAAP wiki is provided on our intranet page under the auditor resources tab. Keep in mind that district use of Web-GAAP is not mandatory and some districts may not utilize these reports. Any SEFA format is acceptable so long as it complies with the requirements above and those of 2 CFR 200.510(b).

Transferability

Expenditures of funds transferred from one program to another should be included in the total expenditures of the receiving program for purposes of (1) determining Major programs and (2) completing the SEFA.

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Education Stabilization Fund (ESF)
Assistance Listing #:	<p>Education Stabilization Fund</p> <p>#84.425B Discretionary Grants: Rethink K-12 Education Models Grants</p> <p>#84.425C Governor’s Emergency Education Relief Fund</p> <p>#84.425D Elementary and Secondary School Emergency Relief Fund</p> <p>#84.425E Higher Education Emergency Relief Fund – Student Aid Portion</p> <p>#84.425F Higher Education Emergency Relief Fund – Institutional Portion</p> <p>#84.425G Discretionary Grants: Reimagining Workforce Preparation Grants</p> <p>#84.425U American Rescue Plan Elementary and Secondary School Emergency Relief Fund</p> <p>84.425X American Rescue Plan State Educational Agency (Outlying Areas)</p>
Note:	<p>The Education Stabilization Fund also contains the following programs; however, these are not likely to occur at most local schools. If they occur, they are not likely to be material. If you need to test one of the following programs, refer to the Addendum of the OMB Circular Compliance Supplement and AOS Auditors contact CFAE using the FACCR Specialty in Spiceworks (IPA use the FACCR Inbox).</p> <p>#84.425A Education Stabilization Fund – State Educational Agency (Outlying Areas)</p> <p>#84.425H Education Stabilization Fund – Governors (Outlying Areas)</p> <p>#84.425J Higher Education Emergency Relief Fund – Historically Black Colleges and Universities (HBCUs)</p> <p>#84.425K Higher Education Emergency Relief Fund – Tribally Controlled Colleges and Universities (TCCUs)</p> <p>#84.425L Higher Education Emergency Relief Fund – Minority Service Institutions (MSIs)</p> <p>#84.425M Higher Education Emergency Relief Fund – Strengthening Institutions Program (SIP)</p> <p>#84.425N Higher Education Emergency Relief Fund – Fund for the Improvement of Post Secondary Education (FIPSE) Formula Grant</p> <p>#84.425P Higher Education Emergency Relief Fund – Institutional Resilience and Expanded Postsecondary Opportunity (IREPO)</p> <p>#84.425Q Higher Education Emergency Relief Fund – Proprietary Institutions Grant Funds for Students</p>

This program specific guidance is in addition to the general reporting requirements on page 2.

ESF is one program broken down into lettered pieces. Each lettered portion of the expenditures should be listed on the SEFA and then a total for the program as a whole. The program as a whole, including all its parts, should be treated as a single program for reporting purposes and major program determinations under Assistance Listing Number 84.425.

This program is NOT a Cluster and should not be labeled as such on the SEFA of the DCF.

In March 2021, the U.S. Department of Education updated its guidance on lost revenue under HEERF. The prior guidance required all lost revenue be supported with allowable expenditures which did not include replacement of revenue. In the updated guidance, which applies retroactively to the beginning of the program, lost revenue was added as one of the allowable uses of all HEERF institutional funds and is applicable to CARES (HEERF I), Consolidated Appropriations Act (HEERF II), and ARP HEERF (HEERF III).

The U.S. Department of Education's [FAQs](#) indicate lost revenue evaluations must be associated with the coronavirus pandemic and can be made back to the March 13, 2020 national emergency declaration.

FAQ #2 states that reimbursement for lost revenue is allowable for the Institutional Portion program (assistance listing number 84.425F) and the (a)(2) and (a)(3) programs (assistance listing numbers 84.425J, K, L, M, and N) for HEERF grant funds received under:

- The Coronavirus Aid, Relief, and Economic Security (CARES) Act (HEERF I);
- The Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA) (HEERF II); and
- The American Rescue Plan (ARP) (HEERF III).

Reimbursement for lost revenue is not an allowable use of funds for the Student Aid Portion program (assistance listing number 84.425E) under HEERF I, HEERF II, or HEERF III or the Proprietary Grant Funds to Students program (assistance listing number 84.425Q), as those grant programs may be used only to provide financial aid grants to students.

FAQ #12 states, the incurring of the "cost" of lost revenue on an institution's HEERF grant award does not need to be assigned to any costs or expenses that the institution will pay using the amount of lost revenue since the allowable cost in the HEERF grant programs is the reimbursement of the lost revenue itself.

Allowable sources of lost revenue include tuition, room, board, fees, summer camps, bookstore, parking, and various other auxiliary services, to name a few (see FAQ #3). Lost revenue does not have to be associated with, or netted against, expenses and is considered an allowable use (type of expenditure) for quarterly and annual reporting to ED and on the Schedule of Expenditures of Federal Awards (SEFA).

FAQ #9 indicates that institutions who claim students who have dropped classes as lost revenue cannot also provide those same students with tuition reimbursement. Auditors should verify institutions meet these restrictions if lost revenue is claimed.

(Source: CFAE)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Provider Relief Fund
Assistance Listing #:	#93.498

The State of Ohio is distributing Coronavirus Relief Funds (CRF) provided to the state from the US Department of Treasury as part of the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act"), including a program which is also called "Provider Relief Fund". Auditors should confirm with their auditees under which PRF program their award is being reported on the SEFA to ensure they were made and reported under the proper Assistance Listing number (#21.019 for CRF/State PRF or #93.498 for the Federal PRF program).

(Source: CFAE)

SEFA reporting amounts for this program (including both expenditures and lost revenues) are based upon the PRF report that is required to be submitted to the HRSA reporting portal (described in "L.3 Special Reporting;" <https://prfreporting.hrsa.gov/s/>) Therefore, it is first important to understand the HRSA PRF reporting requirements which are summarized in the following table.

	Payment Received Period (Payments Exceeding \$10,000 in Aggregate Received)	Deadline to Use Funds	PRF Portal Reporting Time Period	Schedule of Expenditures for Federal Awards (SEFA) Reporting
Period 1	April 10, 2020 to June 30, 2020	June 30, 2021	July 1, 2021 to September 30, 2021	Fiscal Year End (FYE) of June 30, 2021 through June 29, 2022
Period 2	July 1, 2020 to December 31, 2020	December 31, 2021	January 1, 2022 to March 31, 2022	FYE of December 31, 2021 through FYEs June 29, 2022
Period 3	January 1, 2021 to June 30, 2021	June 30, 2022	July 1, 2022 to September 30, 2022	Guidance will be included in 2022 Compliance Supplement
Period 4	July 1, 2021 to December 31, 2021	December 31, 2022	January 1, 2023 to March 31, 2023	Guidance will be included in 2022 Compliance Supplement

Summary of SEFA Reporting of PRF for Fiscal Year Ends (FYE) Covered by the 2021 Compliance Supplement

For a FYE of June 30, 2021, and through FYEs of December 30, 2021, recipients should report in the SEFA, the expenditures and lost revenues from the **Period 1** PRF report.

For a FYE of December 31, 2021 and through FYEs of June 29, 2022, recipients should report in the SEFA, the expenditures and lost revenues from both the **Period 1** and **Period 2** PRF reports.

For FYEs on or after June 30, 2022, SEFA reporting guidance related to **Period 3** and **Period 4** will be provided in covered under the 2022 Compliance Supplement.

Summary of SEFA Reporting of PRF for FYEs Prior to June 30, 2021

Due to delays in the launch of the PRF portal, the SEFA reporting guidance that appeared in the 2020 Compliance Supplement addendum is superseded by the following:

For FYEs on or before June 29, 2021, no PRF expenditures or lost revenues should be reported by recipients on the SEFA until the specified timeframe described in the reporting requirements summarized in the table above.

(Source: 2021 OMB Compliance Supplement, Technical Update, 93.498 Provider Relief Fund)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Temporary Assistance for Needy Families (Tanf) (Title IV-A)
Assistance Listing #:	#93.558

The County federal schedule will report administrative and other expenditures (whether charged directly to the program or allocated through a cost allocation plan or cost pool) paid by the County.

For guidance on ODJFS grants reported on counties SEFA's, auditors should refer to the ODJFS prepared CSEA, PA, and PCSA Federal grant templates at <http://jfs.ohio.gov/ofs/bcfta/TOOLS/tools1.stm>. While the CR 504 CFDA report is a good starting point for counties to determine the expenditures to be reported on the SEFA, there are some programs or parts of program that are not reflected in either of these report. The spreadsheets provide program specific information for testing the SEFA.

At times there may be instances of negative amounts appearing on the CR 504 CFDA report. Auditors should review the documentation at the county for determination of the reason for the negative amounts and determine the effect on the SEFA for instances not addressed below. For example, the counties receive spend down monies from some Medicaid recipients. These are collected on behalf of the State for benefits paid by the state so the spend down monies would not be considered federal dollars at the County level.

Following is the information obtained from ODJFS. Keep in mind this does not include reasoning for all negative amounts reported.

Negative amounts could result from different circumstances:

1. Overpayments made by the county JFS
 - They should be coded back into the system using the same code as the original expenditure.
 - If these are during the calendar year being audited the total federal expenditures would take into consideration these overpayments.
 - If these overpayments are from a prior calendar year the federal schedule should report the negative amounts identifying the program year they are applicable to.
 - If material, auditors should include a footnote.
2. Overpayments made by ODJFS collected by the county JFS - Benefit Recoveries
 - These are benefit recoveries for payments made by ODJFS (Medical, ADC, portions of TANF, SNAP, etc.) and are not reported on the county federal schedule. The county collects these payments on behalf of ODJFS. No cash is returned to ODJFS for these collections. These amounts are retained by the county JFS. ODJFS includes these collections on the CFOS Voucher Activity Report. See note 3 on the federal funding tab concerning refunds and collections.
3. Coding adjustments for reporting errors at the county level (current or prior year grants)
 - Whether or not these are reported should be evaluated on a case by case basis. Auditors should review documentation for these adjustments for federal schedule impact.

Per ODJFS, all grants are reported on a cash basis and should be presented likewise on the SEFA.

To ensure expenditures are reported accurately by Assistance Listing #, auditors should also determine how multi-agency contract expenditures are recorded on the schedule of federal awards expenditures.

The local government should report federal expenditures for Assistance Listing #93.558. 45 CFR 75.510(b)(2) ([2 CFR 200.510](#)(b)(2)) requires including pass-through numbers (if any) on the Schedule. Counties should report the subgrant agreement number (i.e. G-2021-11-5006) as the pass through number and roll the grants up in total by Assistance Listing. Please note there may be two subgrant agreements in place for the calendar year. If that is the case then report both numbers (i.e. G-2021-11-5006 / G-221-11-5007).

Grant Title	Assistance Listing number	Pass through number	Expenditures
Temporary Assistance for Needy Families (Tanf)	#93.558	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Child Support Enforcement – County JFS Only
Assistance Listing #:	#93.563

This program specific guidance is in addition to the general reporting requirements on page 2.

The County federal schedule will report administrative and other expenditures (whether charged directly to the program or allocated through a cost allocation plan or cost pool) paid by the County.

For guidance on ODJFS grants reported on counties SEFA's, auditors should refer to the ODJFS prepared CSEA Federal grant templates at <http://jfs.ohio.gov/ofs/bcfta/TOOLS/tools1.stm>. While the CR 504 CFDA report is a good starting point for counties to determine the expenditures to be reported on the SEFA, there are some programs or parts of program that are not reflected in either of these reports. The spreadsheet provides program specific information for testing the SEFA.

Note: Federal Incentives Budget Reference line with Project code JFSFC905 is for receipt of incentives, not the usage of the incentives. These amounts should not be netted against the other Child Support incentives for reporting on the SEFA. See an example at <http://jfs.ohio.gov/ofs/bcfta/TOOLS/tools1.stm>.

Per ODJFS, all grants are reported on a cash basis and should be presented likewise on the SEFA.

To ensure expenditures are reported accurately by Assistance Listing #, auditors should also determine how multi-agency contract expenditures are recorded on the schedule of federal awards expenditures.

Expenditures are reimbursed to County JFS based on State and Federal allocation percentages. For example, if the Federal share is 66% then the County JFS would be reimbursed 66% from Federal share and 34% from State share or local match (this does not apply to Child Support Incentives). This allocation is programmed into CFIS so auditors are not required to test the allocation; however, rather should be aware of this when testing the schedule of federal awards expenditures.

Auditors should note that Title IV-EAA and State Adoption Subsidy monies have separate eligibility and are not tested at the County JFS level.

The local government should report federal expenditures for Assistance Listing #93.563. 45 CFR 75.510(b)(2) ([2 CFR 200.510\(b\)\(2\)](#)) requires including pass-through numbers (if any) on the Schedule. Counties should report the subgrant agreement number (i.e. G-2021-11-5006) as the pass through number and roll the grants up in total by Assistance Listing. Please note there may be two subgrant agreements in place for the calendar year. If that is the case then report both numbers (i.e. G-2021-11-5006 / G-2021-11-5007).

Grant Title	Assistance Listing number	Pass through number	Expenditures
Child Support Enforcement	#93.563	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX

Although we suggest most local governments continue to create special cost centers to separately summarize amounts for each fiscal year, the CFIS program should provide this information in sufficient detail for federal schedule testing/reporting. The Schedule should also report the following for this program: Assistance Listing number: 93.563; Grant Title: Child Support Enforcement; Disbursements for each pass-through number (i.e., cost center).

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Child Care and Development Fund Cluster (CCDF) – County JFS Only
Assistance Listing #:	#93.489 Child Care Disaster Relief #93.575 Child Care and Development Block Grant #93.596 Child Care Mandatory and Matching Funds of the Child Care and Development Fund

This program specific guidance is in addition to the general reporting requirements on page 2.

The County federal schedule will report administrative and other expenditures (whether charged directly to the program or allocated through a cost allocation plan or cost pool) paid by the County).

For guidance on ODJFS grants reported on counties SEFA's, auditors should refer to the ODJFS prepared PA and PCSA Federal grant templates at <http://jfs.ohio.gov/ofs/bcfta/TOOLS/tools1.stm>. While the CR 504 CFDA report is a good starting point for counties to determine the expenditures to be reported on the SEFA, there are some programs or parts of program that are not reflected in this report. The spreadsheet provides program specific information for testing the SEFA.

Per ODJFS, all grants are reported on a cash basis and should be presented likewise on the SEFA.

To ensure expenditures are reported accurately by Assistance Listing #, auditors should also determine how multi-agency contract expenditures are recorded on the schedule of federal awards expenditures.

The local government should report federal expenditures for Assistance Listing #93.489, #93.575 & #93.596. 45 [CFR 75.510\(b\)\(2\)](#) (2 [CFR 200.510\(b\)\(2\)](#)) requires including pass-through numbers (if any) on the Schedule. Counties should report the subgrant agreement number (i.e. G-2021-11-5006) as the pass through number and roll the grants up in total by Assistance Listing. Please note there may be two subgrant agreements in place for the calendar year. If that is the case then report both numbers (i.e. G-2021-11-5006 / G-2021-11-5007).

Grant Title	Assistance Listing number	Pass through number	Expenditures
Child Care Disaster Relief	#93.489	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX
Child Care and Development Block Grant	#93.575	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX
Child Care Mandatory and Matching Funds of the Child Care and Development Fund	#93.596	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Foster Care (Title IV-E) – County JFS Only
Assistance Listing #:	#93.658

This program specific guidance is in addition to the general reporting requirements on page 2.

The County federal schedule will report administrative and other expenditures paid by the County (including provider payments) whether charged directly to the program or allocated through a cost allocation plan or cost pool.

For guidance on ODJFS grants reported on counties SEFA's, auditors should refer to the ODJFS prepared PA and PCSA Federal grant templates at <http://jfs.ohio.gov/ofs/bcfta/TOOLS/tools1.stm>. While the CR 504 CFDA report is a good starting point for counties to determine the expenditures to be reported on the SEFA, there are some programs or parts of program that are not reflected in either of these reports. The spreadsheets provide program specific information for testing the SEFA.

County courts may receive IV-E reimbursements. Courts are not to be considered subrecipients of the county Foster Care but rather of ODJFS. The court would report their own IV-E FCM and FC admin expenditures on their federal schedule using their pass through numbers and the county JFS would report their own IV-E FCM and FC admin expenditures on their federal schedule and the county would further report both amounts on the county wide federal schedule either separately (if different pass through numbers) or as a gross amount (if same pass through numbers).

Per ODJFS, all grants are reported on a cash basis and should be presented likewise on the SEFA.

To ensure expenditures are reported accurately by Assistance Listing #, auditors should also determine how multi-agency contract expenditures are recorded on the schedule of federal awards expenditures.

[45 CFR 75.510\(b\)\(2\)](#) ([2 CFR 200.510\(b\)\(2\)](#)) requires including pass-through numbers (if any) on the Schedule. Counties should report the subgrant agreement number (i.e. G-2021-11-5006) as the pass through number and roll the grants up in total by Assistance Listing. Please note there may be two subgrant agreements in place for the calendar year. If that is the case then report both numbers (i.e. G-2021-11-5006 / G-2021-11-5007).

Grant Title	Assistance Listing number	Pass through number	Expenditures
Foster Care (Title IV-E)	#93.658	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Adoption Assistance (Title IV-E) – County JFS Only
Assistance Listing #:	#93.659

This program specific guidance is in addition to the general reporting requirements on page 2.

The County federal schedule will report administrative and other expenditures (whether charged directly to the program or allocated through a cost allocation plan or cost pool) paid by the County.

For guidance on ODJFS grants reported on counties SEFA's, auditors should refer to the ODJFS prepared PA and PCSA Federal grant templates at <http://jfs.ohio.gov/ofs/bcfta/TOOLS/tools1.stm>. While the CR 504 CFDA report is a good starting point for counties to determine the expenditures to be reported on the SEFA, there are some programs or parts of program that are not reflected in either of these reports. The spreadsheets provide program specific information for testing the SEFA.

Per ODJFS, all grants are reported on a cash basis and should be presented likewise on the SEFA.

To ensure expenditures are reported accurately by Assistance Listing #, auditors should also determine how multi-agency contract expenditures are recorded on the schedule of federal awards expenditures.

Auditors should note that Title IV-EAA and State Adoption Subsidy monies have separate eligibility and are not tested at the County JFS level.

[45 CFR 75.510\(b\)\(2\)](#) ([2 CFR 200.510\(b\)\(2\)](#)) requires including pass-through numbers (if any) on the Schedule. Counties should report the subgrant agreement number (i.e. G-2021-11-5006) as the pass through number and roll the grants up in total by Assistance Listing. Please note there may be two subgrant agreements in place for the calendar year. If that is the case then report both numbers (i.e. G-2021-11-5006 / G-2021-11-5007).

Grant Title	Assistance Listing number	Pass through number	Expenditures
Adoption Assistance (Title IV-E)	#93.659	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Social Services Block Grant (Title XX) – County JFS Only
Assistance Listing #:	#93.667

This program specific guidance is in addition to the general reporting requirements on page 2.

The County federal schedule will report administrative and other expenditures (whether charged directly to the program or allocated through a cost allocation plan or cost pool) paid by the County.

For guidance on ODJFS grants reported on counties SEFA's, auditors should refer to the ODJFS prepared PA and PCSA Federal grant templates at <http://jfs.ohio.gov/ofs/bcfta/TOOLS/tools1.stm>. While the CR 504 CFDA report is a good starting point for counties to determine the expenditures to be reported on the SEFA, there are some programs or parts of program that are not reflected in either of these reports. The spreadsheet provides program specific information for testing the SEFA.

Per ODJFS, all grants are reported on a cash basis and should be presented likewise on the SEFA.

To ensure expenditures are reported accurately by Assistance Listing #, auditors should also determine how multi-agency contract expenditures are recorded on the schedule of federal awards expenditures.

The local government should report federal expenditures for Assistance Listing #93.667. [45 CFR 75.510\(b\)\(2\)](#) ([2 CFR 200.510\(b\)\(2\)](#)) requires including pass-through numbers (if any) on the Schedule. Counties should report the subgrant agreement number (i.e. G-2021-11-5006) as the pass through number and roll the grants up in total by Assistance Listing. Please note there may be two subgrant agreements in place for the calendar year. If that is the case then report both numbers (i.e. G-2021-11-5006 / G-2021-11-5007).

Grant Title	Assistance Listing number	Pass through number	Expenditures
SSBG	#93.667	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Children's Health Insurance Program (CHIP) – County JFS Only
Assistance Listing #:	#93.767

This program specific guidance is in addition to the general reporting requirements on page 2.

Chip benefits are paid by the State ODJFS; therefore, eligibility and recipient benefit payments will be audited by the State Region.

The County federal schedule will report direct administrative and other expenditures (whether charged directly to the program or allocated through a cost allocation plan or cost pool) paid by the County.

For guidance on ODJFS grants reported on counties SEFA's, auditors should refer to the ODJFS prepared PA and PCSA Federal grant templates at <http://jfs.ohio.gov/ofs/bcfta/TOOLS/tools1.stm>. While the CR 504 CFDA report is a good starting point for counties to determine the expenditures to be reported on the SEFA, there are some programs or parts of program that are not reflected in either of these reports. The spreadsheets provide program specific information for testing the SEFA.

Per ODJFS, all grants are reported on a cash basis and should be presented likewise on the SEFA.

To ensure expenditures are reported accurately by Assistance Listing #, auditors should also determine how multi-agency contract expenditures are recorded on the schedule of federal awards expenditures.

The local government should report federal expenditures for Assistance Listing #93.667. [45 CFR 75.510 \(b\)\(2\)](#) ([2 CFR 200.510\(b\)\(2\)](#)) requires including pass-through numbers (if any) on the Schedule. Counties should report the subgrant agreement number (i.e. G-2021-11-5006) as the pass through number and roll the grants up in total by Assistance Listing. Please note there may be two subgrant agreements in place for the calendar year. If that is the case then report both numbers (i.e. G-2021-11-5006 / G-2021-11-5007).

Grant Title	Assistance Listing number	Pass through number	Expenditures
CHIP	#93.767	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Medicaid Cluster – County JFS Only
Assistance Listing #:	#93.775 State Medicaid Fraud Control Units #93.777 State Survey and Certification of Health Care Providers and Suppliers (Title XVIII) Medicare #93.778 Medical Assistance Program (Medicaid; Title XIX)

This program specific guidance is in addition to the general reporting requirements on page 2.

Note: In accordance with 2 CFR section 200.519, when the auditor is using the risk-based approach for determining major programs, the auditor should consider that the Department of Health and Human Services (HHS) has identified the Medical Assistance Program (Medicaid) as a program of higher risk.

Medicaid is the largest dollar federal grant program and, under OMB budgetary guidance and Pub. L. No. 107-300, HHS is required to provide an estimate of improper payments for Medicaid. Improper payments mean any payments that should not have been made or that were made in an incorrect amount (including overpayments and underpayments) under statutory, contractual, administrative, or other legally applicable requirements. This includes payments for services provided to ineligible providers, payments for an ineligible service, duplicate payments, payments for services not received, and payments that do not account for credit for applicable discounts.

While not precluding an auditor from determining that the Medicaid cluster qualifies as a low-risk program (if prior audits have shown strong internal controls and compliance with Medicaid requirements), the above should be considered as part of the risk assessment process and audit documentation should support the consideration. In addition, even though the state Medicaid Fraud Control Units (MFCUs) and State Survey and Certification of Health Care Providers and Suppliers have substantially fewer federal expenditures than Medicaid, they are clustered with Medicaid because these programs provide significant controls over the expenditures of Medicaid funds. It is unlikely that the expenditures for these two programs would be material to the Medicaid cluster; however, noncompliance with the requirements to administer these controls may be material.

(Source: 2021 OMB Compliance Supplement, Part 4, Department of Health and Human Services, Medicaid Cluster)

Medicaid benefits are paid by the State ODJFS; therefore, eligibility and recipient benefit payments will be audited by the State Region.

The County federal schedule will report administrative and other expenditures paid by the County (including provider payments) whether charged directly to the program or allocated through a cost allocation plan or cost pool.

For guidance on ODJFS grants reported on counties SEFA's, auditors should refer to the ODJFS prepared PA and PCSA Federal grant templates at <http://jfs.ohio.gov/ofs/bcfta/TOOLS/tools1.stm>. While the CR 504 CFDA report is a good starting point for counties to determine the expenditures to be reported on the SEFA, there are some programs or parts of program that are not reflected in either of these reports. The spreadsheets provide program specific information for testing the SEFA.

Per ODJFS, all grants are reported on a cash basis and should be presented likewise on the SEFA.

To ensure expenditures are reported accurately by Assistance Listing #, auditors should also determine how multi-agency contract expenditures are recorded on the schedule of federal awards expenditures.

The local government should report federal expenditures for Assistance Listing #93.775, 93.777, 93.778. [45 CFR 75.510\(b\)\(2\)](#) ([2 CFR 200.510\(b\)\(2\)](#)) requires including pass-through numbers (if any) on the Schedule. Counties should report the subgrant agreement number (i.e. G-2021-11-5006) as the pass through number and roll the grants up in total by Assistance Listing. Please note there may be two subgrant agreements in place for the calendar year. If that is the case then report both numbers (i.e. G-2021-11-5006 / G-2021-11-5007).

Grant Title	Assistance Listing number	Pass through number	Expenditures
Medicaid Cluster Program (list program individually within cluster w/ applicable Assistance Listing #)	#93.775, 93.777, 93.778	G-2021-11-5006 / G-2021-11-5007	\$XXX,XXX

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Medical Assistance Program (Medicaid; Title XIX – Non-JFS Programs) <i>[Note: #93.778 (State Medicaid Fraud Control Units) and #93.777 (State Survey and Certification of Health Care Providers and Suppliers Medicare – Title XVIII) are also clustered with #93.778. However, these programs should only apply at the State level. If auditors encounter these programs at the local level, please contact CFAE for guidance.]</i>
Assistance Listing #:	#93.778

This program specific guidance is in addition to the general reporting requirements on page 2.

Note: In accordance with 2 CFR section 200.519, when the auditor is using the risk-based approach for determining major programs, the auditor should consider that the Department of Health and Human Services (HHS) has identified the Medical Assistance Program (Medicaid) as a program of higher risk.

Medicaid is the largest dollar federal grant program and, under OMB budgetary guidance and Pub. L. No. 107-300, HHS is required to provide an estimate of improper payments for Medicaid. Improper payments mean any payments that should not have been made or that were made in an incorrect amount (including overpayments and underpayments) under statutory, contractual, administrative, or other legally applicable requirements. This includes payments for services provided to ineligible providers, payments for an ineligible service, duplicate payments, payments for services not received, and payments that do not account for credit for applicable discounts.

While not precluding an auditor from determining that the Medicaid cluster qualifies as a low-risk program (if prior audits have shown strong internal controls and compliance with Medicaid requirements), the above should be considered as part of the risk assessment process and audit documentation should support the consideration. In addition, even though the state Medicaid Fraud Control Units (MFCUs) and State Survey and Certification of Health Care Providers and Suppliers have substantially fewer federal expenditures than Medicaid, they are clustered with Medicaid because these programs provide significant controls over the expenditures of Medicaid funds. It is unlikely that the expenditures for these two programs would be material to the Medicaid cluster; however, noncompliance with the requirements to administer these controls may be material.

(Source: 2021 OMB Compliance Supplement, Part 4, Department of Health and Human Service, Medicaid Cluster)

Medicaid Administrative Claiming (MAC) funds received through Ohio Department of Health:

MAC monies passed through the Ohio Department of Health to local health departments are *NOT FEDERAL* dollars and should NOT be reported on the SEFA. These reimbursements are considered to be earned state revenue. ODH has requested the local health department make a notation in their Notes to the SEFA to show they received MAC reimbursement for administrative costs by participating in a quarterly time study. The MAC funding is based on time study results and calculated using a Medicaid Eligible Rate (MER) specific to the County. The underlying expenses are on a cost reimbursement basis and occurred in prior reporting periods.

Since state monies are not required to be disclosed on the SEFA under the Uniform Guidance requirements unless comingled with federal funds, auditors should not take exception to a lack of disclosure regarding these MAC monies. Also, since the disclosure is not a material additional disclosure falling outside the requirements of the Uniform Guidance 2 CFR §200.510 auditors should not take exception to the inclusion. If included, auditors should audit it accordingly.

(Source: AOS CFAE)

Medicaid Waiver Payments

Counties have few characteristics of a subrecipient (e.g. instances where counties provide a portion of the required matching funds). In general, DODD is responsible for most requirements related to the waiver payments. The State Region is responsible for auditing waiver payments as part of the Single Audit of ODJFS and DODD. Therefore, counties should not report waiver payments on the federal award expenditure schedules.

In addition, the Medicaid School Program (MSP) is jointly administered by the Ohio Department of Medicaid and Ohio Department of Education and is exempt from 2 CFR 200 Subpart F requirements. Meaning, MSP recipients are not required to report MSP expenditures on the Federal Schedule, etc.

(Source: AOS CFAE and ODODD)

YEAR ENDED:	2021
FEDERAL AWARD NAME:	Block Grants for Prevention and Treatment of Substance Abuse (SABG)
Assistance Listing #:	#93.959

There is no program specific guidance, please follow the general reporting requirements on page 2.