



Mike DeWine, Governor
Jon Husted, Lt. Governor

Office of Budget
and Management

Kimberly Murnieks, Director

Coronavirus Relief Fund (CRF) Veterans Post COVID Safety Grant



Office of Budget
and Management

Guidance & Frequently Asked Questions

Funding Period:
March 1, 2020 – December 30, 2020

NOTE: As U.S. Department of the Treasury issues future guidance and clarifications, the specific guidelines listed in this document are subject to change. Changes will be addendums to this document in the Frequently Asked Questions section.

CORONAVIRUS RELIEF FUND (CRF) VETERANS POST COVID SAFETY GRANT



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The purpose of this document is to provide guidance to Ohio's Congressionally chartered veterans service organizations with active posts that receive Coronavirus Relief Funding through the Ohio Office of Budget and Management.

Funding Information

Funds were awarded to the State of Ohio as Federal Financial Assistance from the U.S. Department of Treasury. Funds were awarded under the Social Security Act, as amended by section 5001 of the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") as the Coronavirus Relief Fund (CRF).

Eligibility

This program provides funding to Congressionally chartered veterans service organizations in Ohio with an active post. Each active post is eligible for a \$5,000 grant to assist in operating safely during the COVID-19 public health emergency, including supporting increased sanitation costs, maintaining social distancing, purchasing personal protective equipment (PPE) and other necessary costs to comply with public health orders, local health department recommendations, and best practices.

The CARES Act requires that the payments be used to cover expenses that are **necessary** expenditures incurred due to the public health emergency with respect to the Coronavirus Disease 2019 (COVID-19) and were **incurred during the period that begins on March 1, 2020 and ends on December 30, 2020**.

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Frequently Asked Questions

NOTE: Information is provided as a reference and is current as of September 4, 2020. In the event of a conflict between this document and state law, federal law, or U.S. Treasury guidance, the state and federal laws and guidance supersede this document. This document will be updated if the U.S. Treasury provides future clarifications.

Do qualified posts have to apply for the funding?

Yes, OBM requires each post to complete an application on the OBM website at <https://grants.ohio.gov/fundingopportunities.aspx> under the Coronavirus Relief Fund – COVID Safety Funds to Veterans Posts funding opportunity. An authorized representative and grant contact will be required to be listed on the application. After the application is approved by OBM, the grant contact will receive an e-mail confirmation. Approved applications will be processed for payment.

What is the difference between the Authorized Representative and the Grant Contact?

OBM is collecting information from posts receiving funds to allow for future administration and monitoring. The Authorized Representative is the main executive that can authorize acceptance of the funds on behalf of the post. The grant contact will be the main person OBM will reach out to for monitoring or other questions regarding the funds.

How long will it take to receive funds and how will they be received?

Payment will take between 5-10 business days from the approval date of the application. Posts that are active State of Ohio suppliers and have banking information filed with the state will receive the payment via electronic funds transfer. All other payments will be made via check and mailed to the address provided from the Ohio Department of Veteran Services.

Should my post setup a separate account to manage the CARES Act Coronavirus Relief Fund (CRF) funds?

This is not required; however, posts should ensure they can track the funds separately from other post activities and expenditures related to the grant should be tracked separately to be easily identified.

If a post receives Coronavirus Relief Funds or other related funds from another source, are they still eligible for these funds?

Yes, posts are still eligible for these funds but must keep all activity separated for each funding source and ensure costs are not duplicated against multiple sources.

Generally, what are some examples of eligible expenses related to public health precautions that are allowable uses of the CRF funds?

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Examples include, but are not limited to, signage to enforce public health orders or precautions, disinfection of public areas, surfaces, and touchless precautions such as automatic/motion sensor doors, faucets, soap dispensers, hand dryers, and water fountains; masks and hand sanitizer; sanitizing stations, and installation of plexiglass and barriers to create social distancing. Independent contracts to perform deep cleaning or additional cleaning services not previously provided are allowable. Equipment and supplies to perform additional disinfection are also allowable. In all instances, costs must not be previously budgeted, are necessary expenditures incurred due to the public health emergency, and within the covered period (March 1, 2020 through December 30, 2020).

Can the funds be utilized for professional moving services for rearranging furniture to ensure physical distancing within the building?

Yes, as long as this service was not previously budgeted, are necessary expenditures incurred due to the public health emergency, and within the covered period (March 1, 2020 through December 30, 2020).

Are professional cleaning services to perform cleaning of upholstered furniture eligible?

Yes, as long as this service was not previously budgeted, are necessary expenditures incurred due to the public health emergency, and within the covered period (March 1, 2020 through December 30, 2020). Reasonable replacement of upholstered furniture such as chairs to hard plastic to necessitate cost effective cleaning may be allowable.

Can costs associated with new ways to reduce the number of patrons in the facility at one time or to minimize contact be covered?

Costs such as door counters to actively monitor occupancy to comply with public health orders and/or local health department recommendations are allowable. Costs must not be previously budgeted, are necessary expenditures incurred due to the public health emergency, and within the covered period (March 1, 2020 through December 30, 2020).

Are HVAC or ventilation/air handling upgrades allowable?

Overall, costs must not be previously budgeted, are necessary expenditures incurred due to the public health emergency, and within the covered period (March 1, 2020 through December 30, 2020). These types of costs must be recommended and documented as COVID-necessary by the local health department.

What are some examples of prohibited use of funds?

Funds must be directly related to the current public health emergency and may not be used for revenue replacement/forgone revenue or cover expenses covered by insurance or reimbursed through other federal aid or program. Prepayments are also prohibited, as well as reimbursement to donors for donated items or services and payments for legal settlements.

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Can I dispose of assets purchased with CRF funds?

If assets are disposed of prior to December 30, 2020, then the proceeds are subject to the restrictions on eligible use of payments from the Fund.

What happens if there is interest earned on CRF funds?

Interest earned must be placed back into the program and used in a manner consistent with the U.S. Department of Treasury guidance on eligible costs prior to December 30, 2020.

Can CRF funds be used to pay for expenses in preparation for a future COVID-19 outbreak or for pandemic public health measures for a future pandemic or disaster?

CRF funds may be used only for expenditures necessary to address the current COVID-19 public health emergency.

Can we prepay for services or goods that will be provided or received after December 30, 2020?

No. Prepayment for any goods or services is not allowed.

When is a cost incurred?

A cost is incurred when the responsible party has expended funds to cover the cost. The US Treasury updated their guidance document on June 30 to further extend the definition of an incurred cost to include the performance or delivery, as well as a need for receipt, during the “covered period” (March 1, 2020 to December 30, 2020). Posts are required to have incurred costs prior to December 30, 2020.

Who will be monitoring my activities with the funds?

The Office of Budget and Management will be performing subrecipient monitoring of the financial activities with the funds.

How long should posts retain records relating to the CRF and supporting expenditures?

Records shall be maintained for a period of five (5) years after final payment is made using Coronavirus Relief Fund monies.

Who is my grant contact at OBM for questions or concerns?

The Ohio Grants Partnership is available to answer any questions or concerns that you may have via e-mail at grants@obm.ohio.gov.

Does the post have to return any unused funds?

Yes, the post is responsible to have incurred costs for the entire amount of funds provided by December 30, 2020. Any remaining funds must be returned to the State of Ohio.

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What is the process for returning funds to the State of Ohio?

Final returns of payment must be received by the Office of Budget and Management no later than December 30, 2020. Returns can be made via check payable to the Treasurer of the State of Ohio and mailed to:

Ohio Office of Budget and Management
ATTN: Fiscal Section
30 E. Broad St., 34th Floor
Columbus, OH 43215

What are the authoritative resources that can be used in validating allowable use of funds for other necessary costs?

When determining allowable use of funds for other necessary costs, a veterans post should evaluate based on guidance contained within the U.S. Department of Treasury Guidance and Coronavirus Relief Fund Frequently Asked Questions which can be found at <https://home.treasury.gov/policy-issues/cares/state-and-local-governments>. This guidance document calls out some specific eligibility areas and related Frequently Asked Questions provide information about specific uses, but the examples are not all-inclusive.

If a veterans post has any questions regarding the eligibility of a cost, please contact the Ohio Grants Partnership via e-mail at grants@obm.ohio.gov.

What is the federal assistance information for the funding?

The US Department of Treasury did not provide a notice of award to the State of Ohio. A Federal Award Identification Number (FAIN) was found on USASpending.gov to be SLT0018 and SLT0234 and the federal award date is presumed to be the date of enactment of the CARES Act, March 27, 2020.

Funds are considered federal financial assistance and have been assigned a Catalog of Federal Domestic Assistance (CFDA) or Assistance Listing Number of 21.019. Fund payments are considered to be federal financial assistance subject to the Single Audit Act (31 U.S.C. §§ 7501-7507).

What is the official federal performance period of the funds?

The U.S. Department of Treasury has determined that CRF funds may only cover costs **incurred** between **March 1, 2020 and December 30, 2020**.

What are the accounting responsibilities and record retention requirements?

The U.S. Treasury has limited compliance to the related provisions of the Uniform Guidance, 2 C.F.R. § 200.303 regarding internal controls, § 200.330 through § 200.332 regarding subrecipient monitoring and management, and subpart F regarding audit requirements. Effective internal controls must be established and maintained (2 C.F.R. § 200.303). Every CRF dollar should be accounted for with supporting documentation. Veterans posts should maintain documentation evidencing that the funds were expended in accordance with federal, state, and local regulations.

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Are these funds subject to future audits or review?

The CRF is subject to future audits to ensure appropriate use with ultimate recoupment by Treasury. Records must be made available to OBM, the Ohio Auditor of State, Independent Public Auditors that perform audits on behalf of Ohio Auditor of State, the federal government, and/or other oversight entities for audit or review. While these funds are considered payments, they are also subject to and count towards the threshold of the Single Audit Act (31 U.S.C. § 7501-7507).

