Coronavirus Relief Fund Reporting Expenditure Guidance

General Information

The US Treasury Office of Inspector General (OIG) is responsible for monitoring and oversight of the receipt, disbursement, and uses of the Coronavirus Relief Fund. The US Treasury OIG provided reporting requirements to prime recipients on July 31, 2020 and August 28, 2020 (OIG-CA-20-025 and OIG-CA-20-028). The Ohio Office of Budget and Management (OBM) provided supplemental guidance which is intended to assist state agencies that received funding from the Coronavirus Relief Fund to complete their reporting responsibility. This portion of the guidance provides definitions for the expenditure reporting categories.

Expenditure Reporting Overview

The US Treasury OIG has established eighteen categories in which expenditures must be reported for use of funds. As the prime recipient, OBM is required to capture expenditures made in these categories by the state and its recipients and include that expenditure information in the quarterly reporting. OBM has developed some broad definitions on required reporting categories which should be used by recipients when determining where best to report expenditures.

This should be used as a guide and is not all inclusive. It is recognized that costs may relate to more than one category, thus it is imperative that the best fit be consistently selected and where possible follow the definitions below. In instances where a cost does not fit the definitions provided, an entity must make a best determination on where it may fit or enter in the Other Expenditure Amount field and provide a description for the expenditure. Expenditures should be reported in the category that best fits versus splitting the subgrant expenditure across categories.

Expenditure Reporting Categories

The following are the US Treasury OIG defined categories along with associated definitions as a guide:

A) Administrative Expenses

This category should be reserved for necessary expenses directly related for the administration of funds such as audit costs or personnel hired to manage the administration of the funds. It could also include “in-house” personnel costs, as well as “in-house” service and supply-related costs. Costs associated with “administrative” leave for public employees who were granted leave due to a stay at home order and could not telework or case of COVID in the workplace should not be reported under this category. Those costs should be put in category “N. Public Health Expenses.”

B) Budgeted Personnel and Services Diverted to a Substantially Different Use (Subrecipient costs only, see FAQ on state payroll cost reporting)

This category is limited to public employee personnel costs or other budgeted services that were repurposed or diverted to a substantially different use. This should not include personnel costs for public safety and public health employees whose services are substantially dedicated to mitigating or responding to the COVID-19 public health

emergency" which should be reported under category "L. Payroll for Public Health and Safety Employees" even though they may also qualify under the "substantially different use" justification. Health care, human services, or similar employees that are not covered by the U.S. Treasury public health and public safety presumption should be reported in this category.

C) COVID-19 Testing and Contact Tracing

This category should be used for costs associated with COVID-19 testing and contact tracing to include testing kits, supplies, setting up testing sites, equipment, and other associated non-personnel costs directly related to testing and tracing. Personnel costs for public health employees conducting testing or contact tracing should be reported in category "L. Payroll for Public Health and Safety Employees." Contracted services or other personnel-related costs for non-public employees conducting COVID-19 testing or contact tracing should be reported in this category. For example, in the situation of a company being hired to run a testing site, the costs to hire that company implicitly include the company's personnel nonetheless the aggregate cost paid to the company would be reported in this category even though that cost naturally includes its personnel.

D) Economic Support (Other than Small Business, Housing, and Food Assistance)

This category should be used for expenditures related to a government payroll support program, provider assistance, efforts to market tourism, funds provided to facilitate transportation for vulnerable populations, workforce development, and economic support programs provided outside of those related to small business, housing, or food assistance. Economic support programs established to assist individuals with essential services outside of those directly related to housing and food assistance should be reported here.

E) Expenses Associated with the Issuance of Tax Anticipation Notes

This category should be used for costs associated with Tax Anticipation Note issuances.

F) Facilitating Distance Learning

This is limited to expenditures related to distance learning by public or private K-12 schools, colleges and universities or other similar learning institution. This can include such things as purchasing new computers, increasing internet capabilities, and hiring staff to manage/coordinate such activities. This would not include distance learning if done in connection with workforce development which would be included in category "D. Economic Support (Other than Small Business, Housing, and Food Assistance)." Costs associated with telework of public employees should be reported in category "I. Improve Telework Capabilities of Public Employees," unless the telework cost is associated with a teacher or instructor whose job is specifically related to providing or developing distance learning.

G) Food Programs

This category should be used for programs funded to support food insecurity such as to food banks, non-profits, or individuals impacted by COVID-19. This category could also have costs related to providing food to vulnerable populations.

H) Housing Support

This category should be used for programs funded to specifically support housing, to include homelessness and non-congregate sheltering programs or essential service

economic support to individuals to assist with mortgage or rent payments. This includes loans or grants to homeowners/tenants, landlords, housing coalitions, shelters and the like, but only if the funds are earmarked for the express purpose of assisting in housing-related services (as opposed to, for example, a grant given to a small business owner who runs his business out of his house so he uses some of the funds to pay a mortgage, which in this example, should be included in category "O. Small Business Assistance").

I) Improve Telework Capabilities of Public Employees

Costs directly related to telework costs for public employees to include electronic devices such as laptop computers and integrally related items that allow public employees to telework. In addition, other costs necessary to function remotely such as communication meeting platforms such as Zoom or Teams, cybersecurity enhancements, and increased capacity costs should be included here. Costs that facilitate allowing those employees to engage in business activities with the public remotely, for example costs to create a system to allow the general public to submit documents for filing electronically, should also be reported in this category.

J) Medical Expenses

This category should be specifically used for costs associated with a medical setting such as expenses related to hospitals, clinics, or similar facilities; costs related to establishing temporary medical facilities and/or to deal with increased capacity; emergency medical response costs (not including personnel costs); costs associated with establishing telemedicine capabilities; and emergency medical response expenses, including emergency medical transportation, related to COVID.

K) Nursing Home Assistance

This should include assistance provided to a nursing home or assisted living facility for any purposes unless the assistance is earmarked for a purpose that falls into another express category. For example, an undefined grant of assistance of $10,000 that a nursing home may use to buy PPE would go here, but a $10,000 grant to a nursing home to specifically pay for PPE would go in category "M. Personal Protective Equipment." If this assistance is given through a "small business" grant program instead of a nursing home specific grant process, this expense should be included in category "O. Small Business Assistance."

L) Payroll for Public Health and Safety Employees (Subrecipient costs only, see FAQ on state payroll cost reporting)

This includes all public health and public safety employees' personnel costs as defined on page 6 of the US Treasury guidance (https://home.treasury.gov/system/files/136/Coronavirus-Relief-Fund-Guidance-for-State-Territorial-Local-and-Tribal-Governments.pdf). Hazard pay and covered benefits for these employees should also be included in this category. Administrative leave for public employees that could not telework in the event of a stay at home order or case of COVID-19 in the workplace should be reported under category "N. Public Health Expenses." In addition, paid sick and family and medical leave to public employees through the Families First Coronavirus Relief Act (FFCRA), or the Family Medical Leave Act (FMLA) should not be included in this category unless it is specific to covered public

health and safety employees. These costs should be included in category "N. Public Health Expenses."

M) Personal Protective Equipment

This category is specific to expenses for acquisition, distribution, and disposal of personal protective equipment in connection with the COVID-19 public health emergency (i.e., gloves, gowns, masks, face shields and similar clothing-type protective items). To the extent a specific cost can be easily identified for cleaning/disinfecting reusable items of this type (e.g., dry cleaning of reusable gowns), that cleaning cost should be included here. This should also include assistance provided to a subrecipient if the assistance was expressly earmarked for use by the subrecipient for "personal" protective equipment.

N) Public Health Expenses

This category should be used for public health protective measures that are not subsumed in another express category to include a variety of costs such as, but not limited to:

- Costs related to creating social distancing to include costs of barriers, signage, remote options for providing services, facility capacity tracking tools for open public facilities, etc.;
- Expenses for communication and enforcement by governments for public health orders related to COVID-19;
- Expenses for disinfection of public areas and other facilities, e.g., nursing homes, government facilities, parks, etc., in response to the COVID-19 public health emergency;
- Public health precautions to mitigate the spread in public facilities such as touchless features on doors and in bathrooms;
- Expenses for technical assistance to local authorities or other entities on mitigation of COVID-19-related threats to public health and safety;
- Expenses for public safety measures undertaken in response to COVID-19;
- Expenses of providing paid sick and paid family and medical leave to public employees who are infected/directly impacted to enable compliance with COVID-19 public health precautions (FFCRA and FMLA);
- Costs associated with compliance of stay at home orders or for instances of COVID in the workplace to include Administrative Leave provided to employees unable to telework that was beyond budgeted amounts;
- Expenses for quarantining individuals; and
- Expenses of maintaining state prisons and county jails, including sanitation and improvement of social distancing measures to enable compliance with COVID-19 public health precautions.

O) Small Business Assistance

This category should be strictly used for assistance programs for small businesses when the assistance is not expressly earmarked for an expense that falls into one of the other categories. For example, a grant to a small business with the express purpose that it be used to buy PPE would go in category "M. Personal Protective Equipment."

P) Unemployment Benefits

This category should be used strictly for costs related to unemployment benefits related to COVID-19.

Q) Workers' Compensation

This category should be used strictly for costs related to workers' compensation related to COVID-19.

R) Other - Items Not Listed Above

This category should be used as a last resort but may be necessary if no other category fits. Personnel costs reported by subrecipients for employees that are not defined as public health or public safety but were incremental to budgeted amounts (hired specifically to respond to COVID or COVID related, unbudgeted overtime costs) or hazard pay for employees that are not public health or public safety should be reported in this category.