Coronavirus Relief Fund
Reporting and Record Retention Requirements

Department of the Treasury
Office of Inspector General (OIG)
Treasury Office of Inspector General

- Debbie Harker, Assistant Inspector General for Audit
- Donna Joseph, Deputy Assistant Inspector General for Audit
  - Eileen Kao, Audit Director
  - Andrea Smith, Audit Director
Treasury OIG Authority

- Responsible for compliance monitoring and oversight of the receipt, disbursement, and use of Coronavirus Relief Fund payments
- Recouping funds in the event a recipient fails to comply with CARES Act requirements
Monitoring

• Review of prime recipients’ quarterly financial progress report submissions in GrantSolutions
• Desk reviews to assess need to conduct site visits to prime recipients for in-depth reviews or referral of prime recipients for audit
CRF Desk Reviews

- Review of prime recipient’s quarterly financial progress report submissions
- Review other audit reports (i.e. Single Audit, State Auditor reports, Oversight.gov., PandemicOversight.gov) to identify internal control deficiencies or other noncompliance matters
- Review National Association of State Auditors, Comptrollers, and Treasurers newsletters for issues that may pose risks
- Review referrals from Office of Investigations, Pandemic Response Accountability Committee, Office of Counsel, and other external sources
CRF Desk Reviews

• Select a sample of contracts, grants, transfers made to other government entities, loans, direct payments, and payments to individuals

• Review prime recipients’ documentation to sufficiently support selected contracts, grants, transfers made to other government entities, loans, direct payments, and payments to individuals

• Based on the desk review, assess the need to conduct a site visit, a further in-depth desk review, or refer a prime recipient for audit
CRF Audits

- Audits initiated based on:
  - Results of desk reviews and site visits
  - Risk assessments
  - Referrals from Office of Investigations, Office of Counsel, Pandemic Response Accountability Committee, and other external sources
CRF Audits - Criteria

• Per the CARES Act, recipients must use Coronavirus Relief Fund payments to cover costs that:
  • Are necessary expenditures incurred due to the public health emergency with respect to COVID-19;
  • Were not accounted for in the budget most recently approved as of March 27, 2020; and
  • Were incurred during the period that begins on March 1, 2020, and ends on December 30, 2020.
CRF Audits - Guidance

• Department of the Treasury (Treasury)

• Treasury OIG
  • Coronavirus Relief Fund Reporting and Record Retention Requirements (https://www.treasury.gov/about/organizational-structure/ig/Audit%20Reports%20and%20Testimonies/OIG-CA-20-021.pdf)
  • Department of the Treasury Office of Inspector General Coronavirus Relief Fund Frequently Asked Questions Related to Reporting and Recordkeeping (https://www.treasury.gov/about/organizational-structure/ig/Audit%20Reports%20and%20Testimonies/OIG-CA-20-028.pdf)
CRF Audits - Process

- Entrance Conference
  - Conducted with recipient to discuss objectives, scope, methodology

- Conduct Fieldwork
  - Review supporting documentation and conduct interviews

- Discussion Draft Report
  - Opportunity for recipient and Treasury management to review and provide comment
    - Comments to be discussed at Exit Conference

- Formal Draft Report
  - Comments incorporated as appropriate
    - Opportunity for recipient to provide official management response

- Final Report
  - Will include official written response

- Recoupment
  - If determination made to recoup funds, recoupment action will be initiated
Recoupment

There are opportunities for a prime recipient to appeal a determination of non-compliance by the Treasury OIG before and after the covered period ends on December 30, 2020

• Before December 30, 2020
  • Prime recipient is required to recover funds and may redeploy them for COVID-19 related expenditures before December 30, 2020

• After December 30, 2020
  • Treasury OIG will initiate recoupment action through Treasury’s Bureau of Fiscal Service – Centralized Receivable Service
  • There is an appeal/dispute process in the event a prime recipient is delinquent on its debt through Fiscal Service’s debt collection
Treasury OIG Timeline

- Quarterly GrantSolutions Submissions

<table>
<thead>
<tr>
<th>Reporting Cycle</th>
<th>Reporting Period</th>
<th>Open Date</th>
<th>Close Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cycles 1 &amp; 2*</td>
<td>3/1-9/30/2020</td>
<td>12/1/2020</td>
<td>12/15/2020</td>
</tr>
<tr>
<td>Cycle 3</td>
<td>10/1-12/31/2020</td>
<td>12/25/2020</td>
<td>1/11/2021</td>
</tr>
<tr>
<td>Cycle 4</td>
<td>1/1-3/31/2021</td>
<td>1/22/2021</td>
<td>4/12/2021</td>
</tr>
<tr>
<td>Cycle 5</td>
<td>4/1-6/30/2021</td>
<td>4/22/2021</td>
<td>7/12/2021</td>
</tr>
<tr>
<td>Cycle 6</td>
<td>7/1-9/30/2021</td>
<td>7/22/2021</td>
<td>10/12/2021</td>
</tr>
</tbody>
</table>

* Only batch-upload users are still able to enter Cycles 1 and 2 information

- Desk Reviews
  - Beginning November 2020 and will be ongoing

- Audits
  - To continue for next several years
Resources

CARES@oig.treas.gov
1(855) 584-4853, Monday through Friday from 8:00 a.m. to 5:00 p.m. EST
Questions