

State of Vermont Agency of Administration

Coronavirus Relief Fund (CRF)

CRF Treasury Reporting FAQs (for CRF Appropriation Recipients)

Last updated on September 14, 2020

- 1. *If we obligated funds in June but did not expend any funds against this obligation until July, will we be required to submit a CRF Treasury Report on Friday, September 11 for the reporting period of March 1 – June 30, 2020?***

Yes. For the reporting period of March 1 – June 30, 2020, you will report the June obligation amount and details, with an expenditure amount of \$0 if you have not expended any funds against this obligation during the reporting period of March – June 2020. For the following reporting period, you will report the July expenses incurred against this obligation.

- 2. *We have been appropriated CRF funding to use for CRF-eligible expenses that we incurred before we received our CRF funds. Should we report these costs in the reporting period that they were paid (e.g. using General Fund dollars) or when they are charged to CRF?***

For expenses, please report your expenses in the reporting period in which they are charged to CRF in the Vision system. Once you report these expenses, the expenditure date range will capture the dates that the expenses were incurred (the service was rendered or the good was delivered).

Please report CRF obligations in the reporting period that these obligations were made, if specific determinations have been made related to using CRF funds for these obligations (e.g. CRF appropriation authorizing the use of CRF for the obligation), even if expenses have not been charged to CRF against these obligations yet.

- 3. *How do we report a lump sum payment vs. a reimbursable payment to a sub-recipient?***

For a lump sum payment to a sub-recipient, please report the total obligation for the lump sum payment to the sub-recipient. As the sub-recipient uses the funds it received, you are responsible for collecting and reporting on the uses of the sub-recipient as expenditures to the obligation by expenditure category.

For a reimbursable payment to a sub-recipient, first report the total obligation to the sub-recipient. As reimbursements are made to the sub-recipient, please report the reimbursements as expenditures to the obligation by expenditure category.

4. *If we apply for FEMA-PA funding to cover COVID-19 related expenses, but expect to cover these expenses with CRF if FEMA denies the application, should these expenses be reported for CRF when they are incurred, in anticipation of the possibility of FEMA denial?*

You should only report eligible costs for which obligations have been made with CRF payments or specific determinations have been made related to using CRF funds. Please do not report expenses in the CRF Treasury Reporting Template if you applied for FEMA funding for them and did not receive a response yet. Report obligations in the CRF Treasury Reporting Template – in the reporting period in which they were obligated – only if they have been authorized for CRF use through a legislative appropriation or Excess Receipts Request. Report expenditures in the CRF Treasury Reporting Template only when you have incurred these expenses, charged to CRF.

5. *For purposes of reporting, are quasi-state agencies considered a Prime Recipient?*

For the purposes of reporting using Vermont's CRF Treasury Reporting Template, all *CRF Appropriation Recipients* are subject to the same reporting requirements. A CRF Appropriation Recipient is any entity that receives CRF funding directly from the State of Vermont through a direct legislative appropriation and/or Excess Receipts Request to use CRF for grants and/or expenses. Please refer to the Vermont CRF Process and Policy Guidance, updated September 4, 2020, for more detail.

6. *When is an obligation reported? For example, if an Agency administers a grant program, but does not yet know applicant details for the grant, will the obligation date be the same as the expenditure date? Will the performance start and end date be the same as the date of payment?*

Report an obligation in the reporting period in which you entered into the obligation with an entity or individual. Launching a grant program without issuing any grant agreements or awards does not count as an obligation. Once you issue and sign a grant agreement/award, you can report the agreement as an obligation for that reporting period.

The obligation date for the grant is the date that a mutually binding agreement was reached that committed the CRF Appropriation recipient to pay a third party with CRF proceeds – the date signed by the CRF Appropriation Recipient or grantee, whichever is later.

The expenditure date range is reported based on the expenses incurred against that obligation, reported for the first sub-recipient level only.

The performance start and end date are distinct from the date of payment. The performance start date for a grant is the date on which efforts begin or the grant is

otherwise effective. The period of performance end date is the date on which all effort is completed, or the grant is otherwise ended.

Please refer to the CRF Treasury Reporting Template for definitions of each data field as you fill out your report.

- 7. If a grant program offers a grant award of \$50,000 or more to an individual but makes a CRF payment to an entity on behalf of the awarded individual, should this obligation and its associated expenses be reported in the “Agg. – Payments to Individuals” tab or the “Grants >= \$50,000” tab of the CRF Treasury Reporting Template?**

Please report any obligations to individuals, regardless of the obligation amount, in the *Agg. – Payments to Individuals* tab, even if the CRF payments are made to entities on behalf of these awarded individuals.

- 8. If we obligate funds to another government entity in the form of a grant, are the obligated funds to be reported as a transfer to another government entity or as a grant?**

If a grant agreement is in place, the obligation should be reported as a grant.

For all other disbursements or payments to government entities that are legally distinct from the prime recipient and fall within the below categories, report these as transfers.

- State government
- County government
- City/Township Government
- Special District Government
- US Territory or Possession
- Indian/Native American Tribal Government (Federally Recognized)
- Indian/Native American Tribal Designated Organization

- 9. If we contract with a vendor for \$200,000 for cleaning supplies, do we need to show this vendor as a sub-recipient?**

Yes. You need to list as a sub-recipient any entity to which you issue a contract, grant, loan, direct payment, or transfer of \$50,000 or more. In addition to listing the vendor in the *Sub-recipient* tab, please fill in the required details for this contract in the *Contracts >= \$50,000* tab.

10. We administered a grant program where applicants are able to apply and receive CRF funding in more than one application round. If the applicant receives \$10,000 in one reporting period, then applies for additional CRF funding in a subsequent application round and receives \$45,000 during the second reporting period, how would the Agency report this obligation and expense in the CRF Treasury Reporting Template?

If the \$10,000 grant awarded in the first application round was part of a separate and unique grant agreement from the \$45,000 grant awarded in the subsequent round, both grant agreements can be incorporated in the *Agg. for Obligations < \$50,000* tab.

However, if the second grant agreement is an amendment to the first, you would have to report the entity as a sub-recipient and report on the grant in the *Grants >= \$50,000* tab in the second reporting period. This would have to be recorded as a reporting correction in the second reporting period. For additional detail on how to record a reporting correction, please follow the guidance provided in Slide 13 of the Vermont CRF Guidance and Reporting Webinar presentation, from the webinar held on September 8, 2020.

11. A CRF Appropriation Recipient administers multiple CRF grant programs, and applicants are eligible to receive an award from more than one grant program. For example, a farm applies for the AAFM Dairy Assistance Program and receives an award of \$15,000 and then also applies for the AAFM Working Lands program and receives an award for \$45,000. Would AAFM list the farm as a sub-recipient or would the farm just be incorporated in the “Agg. for Obligations < \$50,000” tab of the CRF Treasury Reporting Template?

As long as the awards provided to the farm are part of separate, unique obligations (e.g. grant agreements), each worth less than \$50,000, the obligation and associated expenses can be reported in the *Agg. for Obligations < \$50,000* tab and the grantee does not need to be listed in the *Sub-recipient* tab.

If any single obligation to an entity is \$50,000 or more, please list the entity as a sub-recipient and fill out the required reporting details in the corresponding tab (e.g. *Grants >= \$50,000*).

12. Will the CRF Treasury Reporting Template be updated to include projects for legislative appropriations and Excess Receipts Requests authorized in FY21?

Yes, an updated CRF Treasury Reporting Template will be issued for future reporting periods to incorporate legislative appropriations and ERRs authorized in FY21.

13. If we have the information needed for CRF obligations and expenses from March 1, 2020 to August 31, 2020, can we submit a report for obligations and expenses from March 1 – August 31, 2020?

No – the reporting periods set by the State have been designed to match the reporting periods for which the State is required to report to Treasury on CRF use in the GrantSolutions Portal. The Portal does not allow the State to report on obligations and expenses cumulatively across quarters. Please stick to the reporting periods outlined in Part 3 (B) of the CRF Process and Policy Guidance, last updated on September 4, 2020.

14. If we do not have any CRF obligations and expenses to report for the reporting period of March 1 – June 30, 2020, should we submit a blank report on Friday, September 11, 2020?

If you do not have any obligations or expenses to report for this reporting period, please email the accounts below confirming that you have nothing to report for the reporting period of March 1 – June 30, 2020:

- Brad Ferland Brad.Ferland@vermont.gov
- Justin Kenney Justin.Kenney@vermont.gov
- ADM.CRFData@vermont.gov.

15. How should we report payroll expenses in the CRF Treasury Reporting Template?

Based on Treasury guidance received on September 11, 2020, the State of Vermont has updated its guidance on reporting payroll expenses. Please use the latest guidance, provided below, to report any payroll expenses covered by CRF.

- **Scenario 1:** If the prime recipient provides CRF to a sub-recipient, which the sub-recipient then uses to cover payroll expenses, report this in the associated obligation tab, and select the appropriate payroll expenditure category for the associated payroll expenses as the sub-recipient uses CRF for payroll.

Illustrative example: The Agency of Administration transfers \$1,000,000 in June to a municipality, as part of Project X, to cover payroll expenses for police officers. The municipality uses \$100,000 in June to pay police officers.

In the first reporting period, the Agency of Administration will report the municipality in the *Sub-recipient* tab, then report the \$1,000,000 transfer in the *Transfers >= \$50,000* tab, recording \$1,000,000 as the “Transfer Amount”. The Agency will select Project X for “Project”, then report \$1,000,000 as the “Current Quarter Obligation”. The Agency will report \$100,000 as the “Cost or Expenditure Amount” tied to this obligation and select “Payroll for Public Health and Safety Employees” as the “Cost or Expenditure Category”.

- **Scenario 2:** If the prime recipient provides funding < \$50,000 to another entity, which the entity then uses to cover payroll expenses, report this in the *Agg. for Obligations < \$50,000* tab with the associated payroll expenses as they are incurred.
- **Scenario 3:** If the prime recipient uses CRF to cover its own payroll expenses, providing CRF proceeds directly to individuals for payroll, please report such expenses in the *Agg. Payments to Individuals* tab.

Illustrative Example: The Agency of Administration uses CRF to pay Agency employees who switched their work to administer CRF grants to municipalities as part of the Local Government Expense Reimbursement program. The Agency can report these CRF payroll expenses in the *Agg. – Payments to Individuals* tab as they are incurred.

16. Should we submit multiple reports (one report per project) for each reporting period?

No – please submit one report for each reporting period, reporting on all of your projects, obligations, and associated expenses for the reporting period in one CRF Treasury Reporting Template.

17. Who should we submit the CRF Treasury Report to?

Please submit your CRF Treasury Reports to the following accounts:

- Brad Ferland Brad.Ferland@vermont.gov
- Justin Kenney Justin.Kenney@vermont.gov
- ADM.CRFData@vermont.gov.

18. How should we report on Internal Service Funds, where CRF is used by one State agency/department to cover CRF-eligible expenses and billed to another State agency/department?

For now, please leave out any such obligations and expenses from your CRF Treasury Report – further guidance will be provided this week on how to report CRF expenses incurred by one State agency/department and billed to another State agency/department.

19. If we have a CRF contract worth \$60,000 with a sub-recipient, but only incurred \$10,000 of CRF expenses for this reporting period, can we report on this contract in aggregate?

No – since the obligation amount is \$60,000, please report the contractor as a sub-recipient and report on the obligations and all associated expenses in the *Contracts >= \$50,000* tab, even if the incurred expenses in the reporting period are less than \$50,000.

The \$50,000 reporting threshold is based on the obligation amount, rather than the expense amount. For direct payments made without existing obligations, the \$50,000 reporting threshold applies to the direct payment made from the prime recipient to the sub-recipient.

20. When should we report direct payments that are made to an entity without an existing obligation?

If the direct payment is not associated with a previous obligation, record the direct payment when the expenditure is incurred.