MEMORANDUM

- TO: Coronavirus Relief Fund Municipal Program Recipients
- **FR:** Heath Fahle, A&F FFO
- **DT:** November 16, 2021
- **RE:** Final Reporting & Close Out Process for the Coronavirus Relief Fund Municipal Program

The Commonwealth of Massachusetts made up to \$502 million in federal resources available to municipalities to respond to the public health emergency caused by the Coronavirus Disease (COVID-19) through the Coronavirus Relief Fund – Municipal Program (CvRF-MP). On September 15, 2021, A&F issued a <u>memorandum</u> describing the steps required for a municipality to close out their CvRF-MP grant. On October 29, 2021, the Reconciliation Period closed which was the final opportunity to draw down CvRF-MP resources. This memorandum provides additional guidance on final reporting submissions and the close out process for the CvRF-MP.

Steps to Close Out CvRF-MP

- 1. *CvRF-MP Received:* Use the **final CvRF-MP reporting template** to verify total CvRF-MP received through Round 1, Round 2, and the Reconciliation Period.
 - a. This template replaces the Round 6 template previously distributed. This final reporting template includes updated application and reporting data. Please do not use previous templates as data will be outdated.
 - b. If your municipality submitted an approved round 6 report, the data is incorporated in the new template. If your municipality's round 6 report was not valid, the data is not included and should be corrected in the final report. Many reports were not accepted as they included rejected expenditures from Reconciliation Period applications.
- 2. *CvRF-MP Amount Reported:* Use the final CvRF-MP reporting template to verify the amount reported to A&F to date.
 - a. Amount reported cannot exceed amount received.
 - b. Applications do not serve as reports. Approved expenditures from Reconciliation Period applications can be copied/pasted into reports if not previously reported.
- 3. *Final CvRF-MP Reporting Template:* Use the final CvRF-MP reporting template to report remaining expenditures. This report is due by **December 3, 2021.**
 - a. A&F expects municipalities to have fully reported all CvRF-MP expenditures after submitting this report.
 - b. For municipalities unable to reconcile previous reporting submissions, A&F is offering the opportunity to "start over" reporting. This constitutes A&F removing all data previously reported and providing an updated template where a municipality can include *all* costs incurred on CvRF. Please reach out to A&F if your municipality would like to exercise this option.

- c. Costs incurred after October 29, 2021 cannot be reported unless pre-approval was received from A&F.
- 4. Close Out Certification: Complete the CvRF-MP Close Out Certification Form.
 - a. Verify all reported data, acknowledge ongoing compliance obligations, and return unspent balance, if applicable.
 - b. Data on the close out form is updated weekly. After submitting final report, please give A&F a few weeks to review report, process data, and update data in the Formstack before attempting to close out.

Supporting Information

Costs Incurred After October 29, 2021

As communicated in A&F's <u>September 15, 2021 memo</u>, A&F expects municipalities to have received the beneficial use of CvRF-MP resources (i.e., goods delivered, services rendered) by October 29, 2021. A&F provided a process for municipalities to seek pre-approval for costs for which the beneficial use would take place between October 30, 2021 and December 31, 2021. These pre-approval requests were required to be submitted before October 29, 2021.

In final reporting submissions, municipalities cannot report costs after October 29, 2021 unless pre-approval was granted from A&F. A&F will be reviewing each report and will remove costs reported after October 29, 2021 for which pre-approval was not received.

Adjustments to Reports

A&F recognizes municipalities may require changes to previous reports due to shifting of costs onto or from CvRF. As a result, **A&F is offering the opportunity to "start over" reporting if desired.** This constitutes A&F removing all data previously reported and providing an updated template where a municipality can include *all* costs incurred on CvRF. This eliminates the need to back out costs or try to reconcile previous reports. Please reach out to A&F if you would like to utilize this approach. You must communicate with A&F before taking this approach.

If you do not want to utilize the "start over" approach, please note the following two items when making adjustments in reports:

- Costs previously reported as FEMA eligible were centrally removed by A&F in the fourth reporting period. Do not remove these costs from final reports.
- Reporting to the federal government requires aggregating costs by expenditure categories. Expenditures to be removed from reports must be reported under the same Attachment A Expenditure Subcategory to correctly net the expense.

CvRF-MP Close Out Certification & Return of Unspent Balances

A municipality must have fully reported all CvRF-MP expenditures to close out the grant. This means that the amount paid through CvRF-MP must match the amount reported through quarterly spending reports. If your municipality has an unspent CvRF-MP balance, we will require those funds to be returned to A&F by mailing a check.

Municipalities must complete the CvRF-MP Close Out Certification Form <u>here</u> to close out the grant. In this form, you will be required to:

- Confirm accuracy of data
 - Total Eligible Amount
 - Amount Received through CvRF-MP
 - Amount Reported through CvRF-MP
- Confirm amount to be returned to the Commonwealth (*if applicable, only if amount reported is less than received*)
- Confirm eligible use of CvRF dollars under Treasury and A&F guidance
- Confirm that your municipality worked with MEMA and took all necessary steps to seek FEMA PA reimbursement
- Confirm understanding of ongoing compliance obligations
 - Municipalities are still subject to A&F desk reviews and other audits as applicable
- Confirm understanding of reporting expectations
 - After completion of the close out process, your municipality is not subject to future Commonwealth CvRF reporting deadlines

Please note that data displayed on the Formstack is updated weekly. It may take a few weeks for A&F to review reports, process data, and update Formstack. Please ensure data displayed on the Formstack is correct before submitting a close out form.

Upon submission of form, A&F will:

- Confirm all reported data, including amount to be returned to the Commonwealth
- Complete compliance evaluation to ensure eligibility of reported expenditures
- Verify that your municipality pursued FEMA reimbursement for eligible costs
- Communicate with municipalities regarding any data or compliance concerns
 - A&F will provide municipalities with the opportunity to supply additional detail and documentation for questioned expenditures. A Formstack will be provided to answer questions and upload documentation as needed. Responses must be provided in a timely manner.
 - Expenditures deemed ineligible will be removed from reported data. Municipal accounting should reflect that federal funds were not applied to these expenses.
- To the extent applicable, provide instructions to return the CvRF-MP unspent balance to the Commonwealth
- Send a grant close out confirmation notice when the process is complete