

Schedule of Federal Award Expenditures (SEFA)

2025 Completeness Guide

Important Information

- *Blue italicized text indicates guidance from CFAE.*
- *The links and references to the Uniform Guidance in this document reflect the guidance in place after the 2024 Revisions to the Uniform Guidance. For grants subject to the Uniform Guidance in place prior to the 2024 Revisions, users should review the grant agreement to determine the requirements applicable to that grant and whether additional or different SEFA reporting requirements apply.*
- *This document does not include all Federal programs an entity might report. Revisions to this document are made as FACCRs are released and/or updated.*
- *Program-specific guidance is in addition to the General Guidance for Grants on page 3.*

AOS Auditors: *In addition to the documentation in this file, please review the guidance and test the SEFA Completeness procedures in TeamMate.*

Contents

General Guidance for Grants	3
<i>Reporting in the Schedule of Expenditures of Federal Awards</i>	3
<i>Basis for Determining When Federal Awards are Expended</i>	4
<i>Calculation of SEFA Expenditures for Programs with Loan and Loan Guarantees</i>	4
<i>Grants Passed through the Ohio Department of Education and Workforce (DEW)</i>	5
<i>COVID-19 Federal Expenditures</i>	5
#10.553, #10.555, #10.556, #10.559, #10.582 Child Nutrition Cluster	7
#14.850 Public Housing Operating Fund	10
#14.871, #14.879 Housing Voucher Cluster	11
#14.872 Public Housing Capital Fund	13
#17.258, #17.259, #17.278 Workforce Innovation and Opportunity Act (WIOA) Cluster	14
#32.004 Universal Service Fund – Schools and Libraries (E-Rate)	16
#32.009 Emergency Connectivity Fund Program (ECF)	17
#66.039 Diesel Emission Reduction Act (DERA) National Grants	18
#66.045 Clean School Bus Program	19
#84.007, #84.063, #84.268 Student Financial Assistance Cluster (SFA)	20
#84.010 Title I Grants to Local Educational Agencies	21
#84.027, #84.173 Special Education Cluster (IDEA)	22
#84.041 Impact Aid (Title VII of ESEA)	23
#84.048 Career and Technical Education – Basic Grants to States (Perkins V)	24
#84.282 Charter Schools	25
#84.287 Twenty-First Century Community Learning Centers	26
#84.367 Supporting Effective Instruction State Grants	27
#84.425 Education Stabilization Fund	28

General Guidance for Grants

Reporting in the Schedule of Expenditures of Federal Awards

The auditee must prepare a schedule of expenditures of Federal awards for the period covered by their financial statements, which must include the total Federal awards expended as determined in accordance with [2 CFR § 200.502](#).

*Reminder: For reporting purposes on the SEFA, we are looking at when the **expenditure was MADE** not when the revenue was received. Additionally, auditors should be aware of the period in which expenditures are able to be incurred for COVID-19 programs, as expenditures may have occurred during the fiscal year but not be reimbursed until after fiscal year end.*

While not required, the auditee may choose to provide information requested by Federal awarding agencies and pass-through entities to make the schedule easier to use. For example, when a Federal program has multiple Federal award years, the auditee may list the amount of Federal awards expended for each Federal award year separately.

Auditors should refer to the Federal confirmations available when determining completeness of Federal expenditures presented on the local government's SEFA. Federal confirmations can be found for AOS auditors on the Intranet (Auditor Resources > Confirmation Listings) and for IPAs on the AOS website (Local Governments > Reference Materials > Confirmations; <http://www.ohioauditor.gov/references/confirmations.html>).

At a minimum, per 2 CFR 200.510, the schedule must:

- List individual Federal programs by Federal agency using the applicable Assistance Listing number(s). For a cluster of programs, provide the cluster name, list individual Federal programs within the cluster of programs, and provide the applicable Federal agency name and the applicable Assistance Listing number(s). For research and development (R&D), total Federal awards expended must be shown either by individual Federal award or by Federal agency and major subdivision within the Federal agency. For example, the National Institutes of Health is a major subdivision within the Department of Health and Human Services.
- For Federal awards received as a subrecipient, the name of the pass-through entity and identifying number assigned by the pass-through entity must be included.
- Provide total Federal awards expended for each individual Federal program and the Assistance Listing number or other identifying number when the Assistance Listing information is unavailable. For a cluster of programs, also provide the total for the cluster.
- Include the total amount provided to subrecipients from each Federal program.
- For loan or loan guarantee programs described in § 200.502(b) *Basis for determining Federal awards expended*, identify in the notes to the schedule the balances outstanding at the end of the audit period. This requirement is in addition to including the total Federal awards expended for loan or loan guarantee programs in the schedule.
- Include notes that describe that significant accounting policies used in preparing the schedule, and whether the auditee elected to use the de minimis indirect cost rate as covered in [2 CFR § 200.414](#) *Indirect costs*.

(Source: [2 CFR § 200.510](#))

Basis for Determining When Federal Awards are Expended

Table 7-1

Basis for Determining When Federal Awards Are Expended

<i>Federal Awards</i>	<i>Basis for Determining When Expended</i>
Grants, cost reimbursement contracts, compacts with Indian tribes, cooperative agreements under the Federal Acquisition Regulations (FAR), and direct appropriations	When the expenditure or expense transactions occur
Amounts provided to subrecipients	When the disbursement is made to the subrecipient
Loan and loan guarantees	When the loan proceeds are used by the nonfederal entity (See the further discussion on loans and loan guarantees in table 7-2 and paragraph 7.19 .)
Donated property, including donated surplus property	When the property is received
Food commodities	When the food commodities are distributed or consumed
Interest subsidies	When amounts are disbursed entitling the entity to the subsidy
Insurance	When the insurance is in force
Endowments	When federally restricted amounts are held
Program income	When received or used

(Source: AICPA Single Audit Guide)

Calculation of SEFA Expenditures for Programs with Loan and Loan Guarantees

Several federal programs include loan and loan guarantees. See [2 CFR 200.502\(b\)](#) and tables 1 and 2 below for the basis for determining federal awards expenditures for loan and loan guarantees (loans). Per 2 CFR 200.502(d), “Loans, the proceeds of which were received and expended in prior years, are not considered Federal awards expended...when the Federal statutes, regulations, and the terms and conditions of Federal awards pertaining to such loans impose no continuing compliance requirements other than to repay the loans.”

Local governments should determine if loan and loan guarantee program(s) include significant continuing compliance requirements by reviewing grant information, in discussions with the client and by reviewing programmatic guidance in this document (see Table of Contents or Navigation Pane to locate information about a particular program/cluster). Not all ongoing requirements are considered significant continuing compliance requirements. Per AICPA Single Audit Guide, 7.20,

“The Uniform Guidance does not specifically define the term continuing compliance requirements. Therefore, determining whether a loan has continuing compliance requirements is an important consideration when determining federal awards expended and preparing the schedule of expenditures of federal awards. Some federal agencies assist local governments with making this determination by indicating whether specific loan programs have continuing compliance requirements in the OMB Compliance Supplement. Terms and conditions of federal awards or subawards may also address whether a loan has continuing compliance requirements.”

Applicable program-specific sections of this document and certain FACCRs also offer guidance to help determine if such requirements exist. If significant continuing compliance requirements exist, the local government should include the beginning balance of loans receivable from previous fiscal years when determining expenditures for the program/cluster (See Table 2 below).

Table 1
Calculating federal expenditures for loan programs WITHOUT significant continuing compliance requirements on balances of loans from previous years [200.502(b)]

- + Value of new loans issued by the auditee to other recipients [200.502(b)(1)]
- + Interest subsidy, if any [200.502(b)(3)]*
- + Cash balance on hand in the loan fund at fiscal year-end [200.502(b)(3)]
- + Administrative costs expended by the auditee for administration of the loan program [200.502(b)(3)]
- + Expenditure of proceeds of new loans obtained by the auditee (which the auditee must repay) [200.502(b)(1)]
- = Loan Program Expenditures**

- + Regular programmatic expenditures administered through the program (non-loan programs using the same AL #)
- = Federal expenditures reported on Schedule of Expenditures of Federal Awards**

Table 2
Calculating Federal Expenditures for loan programs WITH significant continuing compliance requirements on balances of loans from previous years [200.502(b)]

- + Value of new loans issued by the auditee to other recipients [200.502(b)(1)]
- + Interest subsidy, if any [200.502(b)(3)]*
- + Cash balance on hand in the loan fund at fiscal year-end [200.502(b)(3)]
- + Administrative costs expended by the auditee for administration of the loan program [200.502(b)(3)]
- + Expenditure of proceeds of new loans obtained by the auditee (which the auditee must repay) [200.502(b)(1)]
- + **Beginning of the fiscal period balance of loans receivable from previous years [200.502(b)(2)]**
- = Loan Program Expenditures**

- + Regular programmatic expenditures administered through the program (non-loan programs using the same AL #)
- = Federal expenditures reported on Schedule of Expenditures of Federal Awards**

*Any interest subsidy (interest paid by the government on behalf of the borrower [i.e., interest buy downs]). We believe it is rare this would occur with a local government-operated loan program.

Grants Passed through the Ohio Department of Education and Workforce (DEW)

OAKS is not currently assigning pass-through numbers. Because DEW may reinstate pass-through numbers in the future, we suggest districts continue to create special cost centers within their funds to separately summarize amounts for each fiscal year.

(Source: Ohio Department of Education and Workforce (DEW))

COVID-19 Federal Expenditures

Expenditures of COVID-19 related funding must be identified on a separate line item with a designation identifying them as COVID-19 Funding. Example:

10.555	National School Lunch Program	\$XX,XXX
10.555	Covid-19 National School Lunch Program	\$XX,XXX

COVID-19 resources are available at https://ohioauditor.gov/resources/COVID19_assistance.html.

SEFA and Footnote resources, including shells, are available for local governments and IPAs at [Single Audit Practice Aids & Audit Report Shells](#) and for AOS auditors on the Federal page of the intranet.

#10.553, #10.555, #10.556, #10.559, #10.582 Child Nutrition Cluster

The following programs are included in this Cluster:

- #10.553 School Breakfast Program (SBP)
- #10.555 National School Lunch Program (NSLP)
- #10.556 Special Milk Program for Children (SMP)
- #10.559 Summer Food Service Program for Children (SFSP)
- #10.582 Fresh Fruit and Vegetable Program (FFVP)

Valuing USDA Donated Foods

The distributing agency or recipient agency must consider the value of USDA donated foods as part of the Nutrition Cluster grants as indicated above. There are two steps in accomplishing this:

1. Determining the quantity of each USDA donated food "expended".
 - a. A distributing agency, and a recipient agency in CSFP, TEFAP, or FDPIR, must consider all USDA donated foods ***distributed or used*** in a school or fiscal year as expended.
 - b. A recipient agency in NSLP, CACFP, or SFSP, or a charitable institution that receives donated foods in accordance with [7 CFR § 250 Subpart E](#), must consider all USDA donated foods ***received*** in a school or fiscal year as expended.
2. Assigning value to the quantity of each USDA donated food "expended".

In accordance with Section 502(g) of the Uniform Guidance ([2 CFR 200.502\(g\)](#)), Federal non-cash assistance, such as USDA donated foods, must be valued at either fair market value (FMV) at the time of receipt, or at the value determined by the Federal agency. Accordingly, for audit purposes, a distributing or recipient agency may use either the FMV of donated foods at the time of their receipt or one of the donated food valuation methods included in [7 CFR 250.58\(e\)](#). For school year 2024-25, Ohio used the value on the annual USDA Foods price file.

Each distributing or recipient agency must choose a method of valuing donated foods for audit purposes. In most cases, it would probably be easier for a distributing or recipient agency to use one of the options listed in 7 CFR 250.58(e), rather than having to determine the FMV at the time of their receipt. However, in some cases it may be easier to use the FMV. Once a distributing or recipient agency has selected a method of assigning value to donated foods, it must use that method consistently in all of its audit activities, and must maintain a record of the means of valuing donated foods for such purpose.

(Source: [USDA Food Distribution National Policy Memorandum FD-104](#), Revised 12/2/2016)

Food Service Management Companies (FSMC)

Entities utilizing a FSMC must consider the impact on the single audit. [FSMC Contracts for FY25](#), provided by DEW, lists schools which contract with FSMCs, the FSMC used, contract type, and contract date.

State of Ohio

- The CATS system is the required system for all schools ordering commodities **directly** from DEW. Schools receiving commodities through the Southwest Ohio Educational Purchasing Council (SWEPC) co-op **will**

not have their activities reflected in CATS. Please refer to the [list of schools](#) that participate in the SWEPC co-op.

- For schools receiving commodities through the SWEPC, auditors should utilize confirmation from the SWEPC (for instance, a PAL report) to verify the commodities reported on the SEFA. PAL reports and other documentation of commodity usage should include itemization of at least three (3) areas of potential commodity allocation:
 - Type, value, and quantity of Direct Delivery (commonly known as “brown box”) cases received.
 - Type, value, and amount of Processor Diversion pounds utilized in finished products sold by commercial distributors, disaggregated by manufacturer and supported by standard calculations from the product/manufacturer’s Summary End Product Data Schedule (SEPDS). Each manufacturer must be included on the [USDA’s National Processor List for 2024-25](#). If the school receives any additional bonus rebates on USDA Foods processed products, supporting documentation should be included to validate that 100% of the rebate value was returned to the Non-Profit School Food Service Account.
 - Total amount allocated and total value received through the USDA Department of Defense Fresh Fruit and Vegetable Program (commonly called “DoD Fresh”). This may be supported by documentation from the Fresh Fruit and Vegetable Order and Receipt System (FFAVORS), a federal Login.gov site accessible by any school that utilizes this option.
- For schools who are **not** members of the SWEPC (i.e. order commodities directly from DEW):
 - Note that in the past, some schools utilized order forms from the CATS system to calculate commodities. Per DEW, this method is not correct as occasionally schools do not receive everything they order.
 - As noted above, schools may select to calculate the FMV of their commodities at the time of receipt, or use the value determined by the Federal agency.
 - If the school participates in the government donated food program, utilizes the CATS system, and uses FMV, you must obtain their support and calculations, and test such.
 - If the school participates in the government donated food program, utilizes the CATS system and used the value determined by the Federal agency, then DEW uses the option “the USDA commodity file cost as of a date specified by the distributing agency” via the CATS system. In February 2014, DEW created a report available in the CATS system to assist clients & auditors in determining this value. The following steps will explain how to obtain this report, as long as the school used the CATS system. The report is available beginning with FY 2013, and will reflect the information in the system at the time the report is generated.
 - In the CATS system, the school can obtain the necessary reports by following these steps.
 - Upon logging into the CATS system, the client should click on “Reports”, then “Value of Commodities Offered/Received”, then choose your program year, ensure the entity name appears in the “Agency” field and click on “Create Report” – this brings up the “Value of Commodities Offered-Received” report. To obtain the commodity value to report on the Federal Schedule, add the figures under the “Received Entitlement Value” and “Received Bonus Value” columns. (While the “Received Converted Value” column is not currently being utilized, if an amount appears in this column in the future, it would need included as well.)

- To print this page, click on the drop-down arrow next to the words “Select a format”, select “pdf” and click the “export” button.
- If the school participates in the Department of Defense (DoD) Fresh Fruit and Vegetable Program, the Department of Defense (DoD) Fresh Fruit and Vegetable Program entitlement value would be contained within the Received Entitlement Value figure presented on the Value of Commodities Offered-Received report since it has been transferred to the Department of Defense. However, you will need to obtain the school’s support for the amount of the Department of Defense (DoD) Fresh Fruit and Vegetable Program entitlement value that was actually used and adjust the Received Entitlement Value by the unused Department of Defense (DoD) Fresh Fruit and Vegetable Program entitlement value portion.
- Processing charges and S&H charges are not included in the values on this report, as they do not get included in the commodities figure on the SEFA. Note as of FY 2016, schools using the state commodity system were not charged shipping fees at all because DEW had enough to cover their administrative fees that year – this is determined on a year-by-year basis.

Please note, not all schools receive “bonus commodities,” which are commodities received in addition to their commodity entitlement.

(Source: Ohio Department of Education and Workforce (DEW))

Carryover from Prior Fiscal Year(s)

Due in large part to the impact of the COVID-19 pandemic, some schools may have had Federal receipts in excess of total food service expenditures for fiscal years 2020, 2021, and/or 2022. Reported SEFA expenditures are limited to actual expenditures plus commodities. Clients and auditors should track the receipts carried into the subsequent fiscal year(s) and report on the subsequent SEFA accordingly until all carryover funding has been reported.

(Source: AOS CFAE and Ohio Department of Education and Workforce (DEW))

Supply Chain Assistance funding is provided by DEW under AL #10.555.

#14.850 Public Housing Operating Fund

The Moving to Work (MTW) demonstration program (Assistance Listing 14.881) allows selected PHAs the flexibility to design and test various approaches to providing and administering housing assistance consistent with the MTW Agreement executed by the PHA and HUD and under the MTW Operations Notice. An MTW agency may apply funding fungibility funds from the following three programs:

1. Section 8 Housing Choice Vouchers (Assistance Listing 14.871)
2. Public Housing Capital Fund (Assistance Listing 14.872)
3. Public Housing Operating Fund (Assistance Listing 14.850)

Depending on if a PHA is operating under an MTW Agreement or the MTW Operations Notice, the auditor should look to the MTW Agreement or the MTW Operations Notice, as applicable, to determine which funds are included. If Public Housing funds are transferred out of Public Housing, pursuant to either an MTW Agreement or the MTW Operations Notice, they are subject to the requirements of the MTW Agreement or the MTW Operations Notice and should not be included in the audit universe and total expenditures for Public Housing when determining Type-A programs. On the Schedule of Expenditures of Federal Awards, the amounts transferred out should not be shown as Public Housing expenditures but should be shown as expenditures for the MTW Demonstration program. Also, if other program funds are transferred into the Public Housing account pursuant to an MTW Agreement or the MTW Operations Notice, all the Public Housing funds would then be considered MTW funds.

If the MTW agency does not transfer all the funds from Public Housing into the MTW account or another program, those funds would be considered and audited, under Public Housing.

(Source: 2025 OMB Compliance Supplement, Part 4, HUD, #14.850 Public Housing Operating Fund)

REAC has interpreted federal awards expended for Single Audit determination purposes as follows:

1. For subsidy programs (Low Rent and Section 8), federal awards expended would equal the net ACC subsidy for the PHA's fiscal period under audit. Specifically, the net Low Rent operating subsidy received, and the net Section 8 (Voucher or Certificate) dollars received, net of year-end adjustments, by the PHA would be the federal awards expended for the fiscal period under audit.
2. For grant programs, federal awards expended would equal the PHA disbursements for allowable costs for that specific grant made within the fiscal period under audit (this would include disbursements charged against the grant award and program income).

(Source: [HUD Clarification of Public Housing Authority Reporting Requirements, Accounting Issue #10](#))

#14.871, #14.879 Housing Voucher Cluster

The following programs are included in this Cluster:

- #14.871 Section 8 Housing Choice Vouchers
- #14.879 Mainstream Vouchers

Recipients should consider disclosing in the Notes to the SEFA that receipts are reported for this program in accordance with Federal Agency Guidance.

EHV program funding is reported under Assistance Listing number 14.871 - "Housing Choice Voucher Program" on the Schedule of Expenditures of Federal Awards. The PHA should identify how much of the EHV funding is included in the total either by a footnote to the SEFA or by adding detail lines in the SEFA itself under the provisions of PIH Notice 2021-25 (HA), Section 8. k.

(Source: 2025 OMB Compliance Supplement, Part 4, HUD, Housing Voucher Cluster)

The Moving to Work (MTW) demonstration program (Assistance Listing 14.881) allows selected PHAs the flexibility to design and test various approaches to providing and administering housing assistance consistent with the MTW Agreement executed by the PHA and HUD and under the MTW Operations Notice. An MTW agency may apply funding fungibility funds from the following three programs:

1. Section 8 Housing Choice Vouchers (Assistance Listing 14.871)
2. Public Housing Capital Fund (Assistance Listing 14.872)
3. Public Housing Operating Fund (Assistance Listing 14.850)

Depending on if a PHA is operating under an MTW Agreement or the MTW Operations Notice, the auditor should look to the MTW Agreement or the MTW Operations Notice, as applicable, to determine which funds are included. If Public Housing funds are transferred out of Public Housing, pursuant to either an MTW Agreement or the MTW Operations Notice, they are subject to the requirements of the MTW Agreement or the MTW Operations Notice and should not be included in the audit universe and total expenditures for Public Housing when determining Type-A programs. On the Schedule of Expenditures of Federal Awards, the amounts transferred out should not be shown as Public Housing expenditures but should be shown as expenditures for the MTW Demonstration program. Also, if other program funds are transferred into the Public Housing account pursuant to an MTW Agreement or the MTW Operations Notice, all the Public Housing funds would then be considered MTW funds.

If the MTW agency does not transfer all the funds from Public Housing into the MTW account or another program, those funds would be considered and audited, under Public Housing.

(Source: 2025 OMB Compliance Supplement, Part 4, HUD, #14.850 Public Housing Operating Fund)

REAC has interpreted federal awards expended for Single Audit determination purposes as follows:

1. For subsidy programs (Low Rent and Section 8), federal awards expended would equal the net ACC subsidy for the PHA's fiscal period under audit. Specifically, the net Low Rent operating subsidy received, and the net Section 8 (Voucher or Certificate) dollars received, net of year-end adjustments, by the PHA would be the federal awards expended for the fiscal period under audit.
2. For grant programs, federal awards expended would equal the PHA disbursements for allowable costs for that specific grant made within the fiscal period under audit (this would include disbursements charged against the grant award and program income).

(Source: [HUD Clarification of Public Housing Authority Reporting Requirements, Accounting Issue #10](#))

#14.872 Public Housing Capital Fund

The Moving to Work (MTW) demonstration program (Assistance Listing 14.881) allows selected PHAs the flexibility to design and test various approaches to providing and administering housing assistance consistent with the MTW Agreement executed by the PHA and HUD. An MTW agency may combine funds from the following three programs:

1. Section 8 Housing Choice Vouchers (Assistance Listing 14.871)
2. Public Housing Capital Fund (Assistance Listing 14.872)
3. Public Housing Operating Fund (Assistance Listing 14.850)

If a PHA is operating under an MTW Agreement, the auditor should look to the MTW Agreement to determine which funds are included in the MTW Agreement. If CFP funds are transferred out of CFP, pursuant to an MTW Agreement, they are subject to the requirements of the MTW Agreement and should not be included in the audit universe and total expenditures for CFP when determining Type A programs. On the Schedule of Expenditures of Federal Awards, the amounts transferred out should not be shown as CFP expenditures but should be shown as expenditures for the MTW Demonstration program. Also, if other program funds are transferred into the CFP account pursuant to an MTW Agreement, all of the CFP funds would then be considered MTW funds.

Where the MTW agency does not transfer all the funds from the CFP into the MTW account or another of the authorized program, those funds would be considered, and audited, under the CFP.

(Source: 2025 OMB Compliance Supplement, Part 4, HUD, #14.872 Public Housing Capital Fund)

REAC has interpreted federal awards expended for Single Audit determination purposes as follows:

1. For subsidy programs (Low Rent and Section 8), federal awards expended would equal the net ACC subsidy for the PHA's fiscal period under audit. Specifically, the net Low Rent operating subsidy received, and the net Section 8 (Voucher or Certificate) dollars received, net of year-end adjustments, by the PHA would be the federal awards expended for the fiscal period under audit.
2. For grant programs, federal awards expended would equal the PHA disbursements for allowable costs for that specific grant made within the fiscal period under audit (this would include disbursements charged against the grant award and program income).

(Source: [HUD Clarification of Public Housing Authority Reporting Requirements, Accounting Issue #10](#))

#17.258, #17.259, #17.278 Workforce Innovation and Opportunity Act (WIOA) Cluster

The following programs are included in this Cluster:

- *#17.258 WIOA Adult Program*
- *#17.259 WIOA Youth Activities*
- *#17.278 WIOA Dislocated Worker Formula Grants*

ODJFS issues all WIOA funds to the 20 local area fiscal agents. The fiscal agents disburse funds to various local entities delivering the services including:

- Staff to the Local Workforce Development Board (LWDB) and fiscal agent who expend WIOA Administrative funds (up to 10 percent of the grant)
- Subrecipients, which may include OhioMeansJobs center operators, County JFS agencies and non-profits such as county Community Action Agencies
- Youth providers, which must be procured competitively by the LWDB unless the LWDB opts to designate the CCMEP Lead Agency to carry-out certain permissible activities as defined in WIOA policy letter
- Optional other subrecipients such as providers of Adult and Dislocated Worker career services that do not need to be procured competitively

All of the above organizations, if determined to be subrecipients rather than contractors, must report their federal spending on their SEFA.

Note: Previously under WIA, a single Local Workforce Area (LWA) could hold multiple roles listed above (i.e. serve as staff to the LWDB, service provider, and One-Stop (OhioMeansJobs) center operator). The new requirement to procure OhioMeansJobs center operators under WIOA and other LWDB oversight responsibilities led ODJFS to require organizational separation between the staff to the LWDB and the entities providing services to job seekers and youth. Because of the need for separation between LWDB staff and service providers, some LWAs established Councils of Government (COGs) to employ LWDB staff. All new COGs established by a LWA, must complete an analysis to determine who should be reporting the federal funding and receiving the single audit.

See also [WIOA Policy Letter No. 15-18.1](#)

Reporting WIOA on County Schedules of Federal Awards Expenditures (SEFAs)

For guidance on ODJFS grants reporting on county SEFAs, auditors should refer to the ODJFS prepared [2024 WIOA Federal grant template](#) (*the 2024 template is linked, the 2025 template will be linked when ODJFS releases it*). The ODJFS Federal grant template spreadsheet provides program specific information for testing the SEFA.

Fiscal agents may disclose the amounts they transmit to other entities in the notes to their federal awards expenditure schedule. However, fiscal agents should not report these amounts as disbursements in their Schedule. (Fiscal agents should only report any amounts they disburse as a WIOA subrecipient in their Schedule). Counties and other entities receiving WIOA from the fiscal agents should report their disbursements as pass-through assistance from their LWA workforce development agency in their federal awards expenditure schedule.

The County or LWA workforce development agency should report federal disbursements for the WIOA Cluster in the workforce development fund. At a minimum, the County or LWA workforce development agency should report the total fiscal year WIOA Cluster disbursements, by program and cluster. The County or LWA workforce

development agency should also separate each program by Administrative and Non-administrative dollars. 2 CFR 200 requires including pass-through numbers (if any) on the Schedule. The ODJFS Director confirmed that a pass-through number should be printed on all WIOA awards to local governments. The Schedule should also report the following for the WIOA Cluster:

- Assistance Listing Numbers & Grant Titles:
 - #17.258 – WIOA Adult Program
 - #17.259 –WIOA Youth Activities *
 - #17.278 –WIOA Dislocated Worker Formula Grants
- Disbursements for each pass-through number (i.e., cost center), program, and cluster total.

** = OAC section 5101:14-1-01 has named the WIOA Youth program the “Comprehensive Case Management and Employment Program (CCMEP)” which integrates WIOA Youth services with TANF-funded activities at the county (CDJFS) level.*

DOL requires an accrual accounting basis for WIOA grant reporting. As a result, fiscal agents must report both their disbursements and accruals (i.e. their accrued expenses) for every WIOA funding stream.

- Are they required to have accounting systems that are accrual basis year-round?
 - No – 2 CFR 2900.14 explains that a grant recipient is not required to convert its accounting system. Accruals must be reported using best estimates based on analysis of the documentation on hand, even if the entity is not using an accrual accounting system.
- Do they just need to make accrual adjustments to annual/quarterly reports?
 - Yes -- the financial system that all ODJFS subrecipients use (County Finance Information System or CFIS) allows reporting of both the disbursements and accruals using separate account codes. Traditionally the LWAs used spreadsheets or other methods to calculate their accruals and report the total using the accrual account code. New functionality in CFIS launched in June 2016 now automates the accrual calculation for services provided directly to a participant such as classroom training costs, On-the-Job Training, work experience wages, etc. based on the dates of service entered.
- Does the SEFA need to be on accrual basis?
 - No. 2 CFR Part 2900.14 states, in addition to the guidance set forth in 2 CFR 200.328, for Federal awards from DOL, the DOL awarding agency will prescribe whether the report will be on a cash or an accrual basis. If the DOL awarding agency requires reporting on an accrual basis and the recipient's accounting system is not on the accrual basis, the recipient will not be required to convert its accounting system but must develop and report such accrual information through best estimates based on an analysis of the documentation on hand.

Thomas DiLisio from DOL confirmed on December 8, 2021, that the SEFA is *not* required to be reported on an accrual basis.

ODJFS performs a completeness test of WIOA monies sent by ODJFS with the county and LWA agency federal schedules. However, ODJFS tests completeness at the LWA workforce development agency level. If the auditor wishes to obtain 3rd party confirmations of the WIOA receipts amounts reported on the County's Federal Schedule, audit staff should contact the appropriate LWA agency. If the LWA agency is included in the County's reporting entity, please contact Sabrina Jamison at (614) 728-1476 or Sabrina.Jamison@jfs.ohio.gov for confirmation of WIOA Monies sent to the County.

(Source: Sabrina Jamison and Paige Thomas, ODJFS, 7/16/2025 and Thomas DiLisio, US Department of Labor 12/8/2021)

#32.004 Universal Service Fund – Schools and Libraries (E-Rate)

The FCC previously indicated intent to subject E-Rate to Single Audit Requirements (2 CFR 200, Subpart F), however ultimately decided the E-Rate program should not be reported on the SEFA or subject to single audit. For additional guidance on E-Rate, refer to [Bulletin 2000-014](#).

#32.009 Emergency Connectivity Fund Program (ECF)

The Emergency Connectivity Fund is a reimbursement-basis program administered by the Federal Communications Commission (FCC). The FCC allows for two reimbursement methods:

- *Billed Entity Applicant Reimbursement (BEAR) in which the entity pays the vendor and subsequently seeks reimbursement from the FCC.*
- *Service Provider Invoicing (SPI) in which the service provider invoices the FCC directly for program expenditures.*

Expenditures should be reported on the SEFA based on the date the expenditure is made for the goods/services regardless of the reimbursement method used (i.e. BEAR or SPI method). If SPI, the government needs to work with the service provider to determine the date paid.

Auditors should be aware that the FCC provides decision letters and commitment decision letters to entities as a part of project approvals. Those letters do not necessarily dictate when expenditures are recorded on the SEFA, expenditures should be reported when actually paid. However, the decision letters and commitment decision letters may impact SEFA reporting if the approval process and expenditures span more than one fiscal year. For instance, if a government plans to seek reimbursement for expenditures paid in October 2022 but doesn't receive a decision letter until early 2023, then as of December 31, 2022, the grant isn't executed and the expenditures wouldn't be reported on the SEFA. In that case, the government should refer to the guidance in the [Prior Fiscal Year Expenditure Advisory Memo](#).

For financial reporting purposes, entities subject to ORC 5705.09, .12, .14, and/or .16 are required to establish a separate special revenue fund to track grant activity. Note that most libraries are not subject to these ORC sections, so they have more flexibility as to how they track grant activity; however, they are still subject to Federal requirements for separate accountability.

Governments should record receipts when received and expenditures when paid in their ledgers. For on-behalf (SPI) activity, the receipt and related expenditures should be recorded as memo entries when the service provider executes the payment (or issues a credit).

For GAAP statements, governments need to determine whether the grant is executed as of fiscal year-end and the decision letter and/or commitment decision letter would indicate that the grant is executed. When the letters and project expenditures straddle fiscal years, there may be situations where 2022 expenditures would be recorded in 2023 if the decision letter and/or commitment decision letter was received in 2023. If the grant is executed, a receivable should be recorded only to the extent that allowable costs have been incurred but not reimbursed at year-end. The receivable should be offset by deferred inflows or revenue based on the government's revenue recognition period. In the rare case that any dollars are received prior to being expended, they would be recorded as unearned revenue.

#66.039 Diesel Emission Reduction Act (DERA) National Grants

Schools are eligible recipients of DERA School Bus Rebates. These DERA School Bus Rebates are Federal grants from the US EPA and should be reported under AL #66.039.

(Source: Carolyn Watkins, Chief, Office of Environmental Education, Ohio EPA)

#66.045 Clean School Bus Program

Clean School Bus Rebates are required to be reported on the Schedule of Expenditures of Federal Awards.

(Source: ERG, Contractor to US EPA 12/5/2024)

#84.007, #84.063, #84.268 Student Financial Assistance Cluster (SFA)

The following programs are included in the FACCR for this Cluster:

- #84.007 Federal Supplemental Educational Opportunity Grants (FSEOG)
- #84.063 Federal Pell Grant Program
- #84.268 Federal Direct Student Loans

The Student Financial Assistance Cluster also contains the following programs; however, they are not likely to occur at most local schools therefore are not included in the FACCR.

- #84.033 Federal Work-Study Program
- #84.038 Federal Perkins Loan Program
- #84.379 Teacher Education Assistance for College and Higher Education Grants (TEACH Grants)
- #84.408 Postsecondary Education Scholarships for Veteran's Dependents (Iraq and Afghanistan Service Grant (IASG))
- #93.264 Nurse Faculty Loan Program (NFLP)
- #93.342 Health Professions Student Loans, Including Primary Care Loans and Loans for Disadvantaged Students (HPSL/PCL/LDS)
- #93.364 Nursing Student Loans (NSL)
- #93.925 Scholarships for Health Professions Students from Disadvantaged Backgrounds – Scholarships for Disadvantaged Students (SDS)

Auditors should note that, even though student loans under the Direct Loan Program (Assistance Listing 84.268) are made to students (not the institution of higher education), under this loan program, auditors must include the value of loans made to students during the audit period as Federal awards expended under the SFA Cluster in the Schedule of Expenditures of Federal Awards (SEFA). (See [2 CFR Section 200.502\(c\)](#)) Also, if the entity is administering the Federal Perkins Loan Program (Assistance Listing 84.038), it retains a Perkins Revolving Loan fund. The entire amount in that fund, including outstanding FPL loans to students, must be included as Federal awards expended in the SEFA.

Auditors should refer to [AOS Bulletin 2009-002](#), Reporting Federal Student Loans – Adult Education, for accounting and reporting guidance on the SFA Cluster. While this bulletin references pre-UG guidance instead of UG since those were the requirements in place at the time the bulletin was written; the guidance is still accurate.

#84.010 Title I Grants to Local Educational Agencies

Title I-A 15% Carryover Limitation and Waiver

The Elementary and Secondary Education Act (ESEA) limits the amount of an LEA's Title I-A award that may be carried over to 15 percent of the original award. Local Education Agencies may request a waiver of this requirement once every three years in order to carry over more than 15 percent of the award.

(Source: <https://ccip.ode.state.oh.us/documentlibrary/ViewDocument.aspx?DocumentKey=92516>)

1. Consolidation of Administrative Funds (SEAs and LEAs)

ESEA programs in this Supplement to which this section applies are Title I, Part A (84.010); MEP (84.011); CSP (84.282); 21st CCLC (84.287); Title III, Part A (84.365); Title II, Part A (84.367); and Title IV, Part A (84.424A) including the Stronger Connections Grant (84.424F).

This section also applies to ESSER, GEER, and EANS (84.425C, D, R, U, and V).

State and local administrative funds that are consolidated (as described in III.A.1, "Activities Allowed or Unallowed – Consolidation of Administrative Funds (SEAs and LEAs)") should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the Schedule of Expenditures of Federal Awards (SEFA). A footnote showing, by program, amounts of administrative funds consolidated is encouraged.

2. Schoolwide Programs (LEAs)

ESEA programs in this Supplement to which this section applies are Title I, Part A (84.010); MEP (84.011); Title III, Part A (84.365); Title II, Part A (84.367); and Title IV, Part A (84.424A) not including the Stronger Connections Grant (84.424F).

This section also applies to IDEA (84.027 and 84.173) and CTE (84.048).

Since schoolwide programs are not separate Federal programs, as defined in 2 CFR section 200.42, expenditures of Federal funds consolidated in schoolwide programs should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the SEFA. A footnote showing, by program, amounts consolidated in schoolwide programs is encouraged.

(Source: 2025 OMB Compliance Supplement, Part 4, Department of Education Crosscutting Procedures)

Under ESSA, School Improvement Grants are not reported as a separate program and are included as a set-aside in Title I.

(Source: Ohio Department of Education and Workforce (DEW))

#84.027, #84.173 Special Education Cluster (IDEA)

The following programs are included in this Cluster:

- *#84.027 Special Education – Grants to States (IDEA Part B)*
- *#84.173 Special Education – Preschool Grants (IDEA Preschool)*

Beginning in January 2025, the State of Ohio Distribution Transaction Listing began identifying the Department of Children and Youth (DCY) as the state agency for payments of Special Education Preschool grant funding (AL #84.173). However, based on discussions with ODEW in November 2025, ODEW remains the pass-through entity for this funding. Accordingly, SEFAs should continue to reflect ODEW as the pass-through entity.

Schoolwide Programs (LEAs)

ESEA programs in this Supplement to which this section applies are Title I, Part A (84.010); MEP (84.011); Title III, Part A (84.365); Title II, Part A (84.367); and Title IV, Part A (84.424A) not including the Stronger Connections Grant (84.424F).

This section also applies to IDEA (84.027 and 84.173) and CTE (84.048).

Since schoolwide programs are not separate Federal programs, as defined in 2 CFR section 200.42, expenditures of Federal funds consolidated in schoolwide programs should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the SEFA. A footnote showing, by program, amounts consolidated in schoolwide programs is encouraged.

(Source: 2025 OMB Compliance Supplement, Part 4, Department of Education Crosscutting Procedures)

#84.041 Impact Aid (Title VII of ESEA)

Given the nature of the Section 7002 funds, a recipient expending only Section 7002 funds would have no compliance requirements subject to testing for the Impact Aid program or would only be subject to the Wage Rate Requirements (20 USC 1232b) if 7002 funds were spent for construction or minor remodeling. Selecting the Impact Aid program as a major federal program in fiscal years where no (or only one) compliance requirements are subject to testing could result in the exclusion of other programs as major federal programs. Therefore, if a recipient had Impact Aid expenditures only from Section 7002 funds during its fiscal year, the auditor must exclude the amount of the 7002 Impact Aid expenditures from the determination of the Type A/B program threshold. If a recipient had Impact Aid expenditures from multiple sections, including Section 7002, the entire amount of Impact Aid expenditures should be considered when determining the Type A/B program threshold and the 7002 funds would only be subject to Wage Rate Requirements testing, if applicable. All Impact Aid expenditures, including Section 7002 funds excluded from the Type A/B program threshold, must be reported on the Schedule of Expenditures of Federal Awards.

(Source: 2025 OMB Compliance Supplement, Part 4, Department of Education, AL #84.041 Impact Aid)

The Department of Education Office of Inspector General clarified to CFAE via e-mail on March 8, 2024 that AL #84.041 should be excluded from consideration as a major program if an entity only expended 7002 funds which were not subject to any compliance requirements (including Wage Rate requirements).

#84.048 Career and Technical Education – Basic Grants to States (Perkins V)

Schoolwide Programs (LEAs)

ESEA programs in this Supplement to which this section applies are Title I, Part A (84.010); MEP (84.011); Title III, Part A (84.365); Title II, Part A (84.367); and Title IV, Part A (84.424A) not including the Stronger Connections Grant (84.424F).

This section also applies to IDEA (84.027 and 84.173) and CTE (84.048).

Since schoolwide programs are not separate Federal programs, as defined in 2 CFR section 200.42, expenditures of Federal funds consolidated in schoolwide programs should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the SEFA. A footnote showing, by program, amounts consolidated in schoolwide programs is encouraged.

(Source: 2025 OMB Compliance Supplement, Part 4, Department of Education Crosscutting Procedures)

#84.282 Charter Schools

This program does not currently have a CFAE-prepared FACCR available, however, it is a Federal Grant program (NOT a state grant) administered by the U.S. Department of Education and passed through the Ohio Department of Education and Workforce (DEW) that should be included in the SEFA for entities receiving the grant.

(Source: Ohio Department of Education and Workforce (DEW))

Consolidation of Administrative Funds (SEAs and LEAs)

ESEA programs in this Supplement to which this section applies are Title I, Part A (84.010); MEP (84.011); CSP (84.282); 21st CCLC (84.287); Title III, Part A (84.365); Title II, Part A (84.367); and Title IV, Part A (84.424A) including the Stronger Connections Grant (84.424F).

This section also applies to ESSER, GEER, and EANS (84.425C, D, R, U, and V).

State and local administrative funds that are consolidated (as described in III.A.1, “Activities Allowed or Unallowed – Consolidation of Administrative Funds (SEAs and LEAs)”) should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the Schedule of Expenditures of Federal Awards (SEFA). A footnote showing, by program, amounts of administrative funds consolidated is encouraged.

(Source: 2025 OMB Compliance Supplement, Part 4, Department of Education Crosscutting Procedures)

#84.287 Twenty-First Century Community Learning Centers

Consolidation of Administrative Funds (SEAs and LEAs)

ESEA programs in this Supplement to which this section applies are Title I, Part A (84.010); MEP (84.011); CSP (84.282); 21st CCLC (84.287); Title III, Part A (84.365); Title II, Part A (84.367); and Title IV, Part A (84.424A) including the Stronger Connections Grant (84.424F).

This section also applies to ESSER, GEER, and EANS (84.425C, D, R, U, and V).

State and local administrative funds that are consolidated (as described in III.A.1, “Activities Allowed or Unallowed – Consolidation of Administrative Funds (SEAs and LEAs)”) should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the Schedule of Expenditures of Federal Awards (SEFA). A footnote showing, by program, amounts of administrative funds consolidated is encouraged.

(Source: 2025 OMB Compliance Supplement, Part 4, Department of Education Crosscutting Procedures)

#84.367 Supporting Effective Instruction State Grants

Funds under the Small, Rural School Achievement (SRSA) program (Assistance Listing 84.358A) may be used for activities allowed under other programs, including this program Title II, Part A.

Expenditures for allowable activities under Title II, Part A from funds awarded for the SRSA Funds Program should be included in the audit universe and total expenditures of Assistance Listing 84.358A (i.e., from the program from which they originated) for purposes of (1) determining Type A programs and (2) completing the Schedule of Expenditures of Federal Awards (SEFA).

(Source: 2025 OMB Compliance Supplement, Part 4, Department of Education, AL #84.367)

1. Consolidation of Administrative Funds (SEAs and LEAs)

ESEA programs in this Supplement to which this section applies are Title I, Part A (84.010); MEP (84.011); CSP (84.282); 21st CCLC (84.287); Title III, Part A (84.365); Title II, Part A (84.367); and Title IV, Part A (84.424A) including the Stronger Connections Grant (84.424F).

This section also applies to ESSER, GEER, and EANS (84.425C, D, R, U, and V).

State and local administrative funds that are consolidated (as described in III.A.1, “Activities Allowed or Unallowed – Consolidation of Administrative Funds (SEAs and LEAs)”) should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the Schedule of Expenditures of Federal Awards (SEFA). A footnote showing, by program, amounts of administrative funds consolidated is encouraged.

2. Schoolwide Programs (LEAs)

ESEA programs in this Supplement to which this section applies are Title I, Part A (84.010); MEP (84.011); Title III, Part A (84.365); Title II, Part A (84.367); and Title IV, Part A (84.424A) not including the Stronger Connections Grant (84.424F).

This section also applies to IDEA (84.027 and 84.173) and CTE (84.048).

Since schoolwide programs are not separate Federal programs, as defined in 2 CFR section 200.42, expenditures of Federal funds consolidated in schoolwide programs should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the SEFA. A footnote showing, by program, amounts consolidated in schoolwide programs is encouraged.

3. Transferability (SEAs and LEAs)

ESEA programs in this Supplement to which this section applies are Title II, Part A (84.367) and Title IV, Part A (84.424A) not including the Stronger Connections Grant (84.424F).

Expenditures of funds transferred from one program to another (as described in III.A.3, “Activities Allowed or Unallowed – Transferability (SEAs and LEAs)”) should be included in the audit universe and total expenditures of the receiving program for purposes of (1) determining Type A programs, and (2) completing the SEFA. A footnote showing amounts transferred between programs is encouraged.

(Source: 2025 OMB Compliance Supplement, Part 4, Department of Education Crosscutting Procedures)

#84.425 Education Stabilization Fund

The following are included in this program:

- *Included in ESSER FACCR*
 - #84.425A Education Stabilization Fund – State Educational Agency (Outlying Areas) (ESF-SEA)
 - #84.425C Governor’s Emergency Education Relief Fund (GEER I and II)
 - #84.425D Elementary and Secondary School Emergency Relief Fund (ESSER I and II)
 - #84.425H Education Stabilization Fund – Governors (Outlying Areas) (ESF-Governor)
 - #84.425R Coronavirus Response and Relief Supplemental Appropriations Act, 2021 –Emergency Assistance to Non-Public Schools (CRRSA EANS) Program
 - #84.425U American Rescue Plan Elementary and Secondary School Emergency Relief (ARP ESSER) Fund
 - #84.425V American Rescue Plan Emergency Assistance to Non-Public Schools (ARP EANS)
 - #84.425X American Recue Plan – Outlying Areas State Educational Agency (ARP-OA-SEA)
- *Included in HEERF FACCR*
 - #84.425E Higher Education Emergency Relief (HEERF) Fund – Student Aid Portion
 - #84.425F Higher Education Emergency Relief (HEERF) Fund – Institutional Portion
 - #84.425J Higher Education Emergency Relief Fund – Historically Black Colleges and Universities (HBCUs)
 - #84.425K Higher Education Emergency Relief Fund – Tribally Controlled Colleges and Universities (TCCUs)
 - #84.425L Higher Education Emergency Relief Fund – Minority Service Institutions (MSIs)
 - #84.425M Higher Education Emergency Relief Fund – Strengthening Institutions Program (SIP)
 - #84.425N Higher Education Emergency Relief Fund – Fund for the Improvement of Postsecondary Education (FIPSE) Formula Grant
 - #84.425P Institutional Resilience and Expanded Postsecondary Opportunity (HEERF IREPO)
 - #84.425S HEERF Supplemental Assistance to Institutions of Higher Education (SAIHE)
 - #84.425T HEERF Supplemental Support Under American Rescue Plan (SSARP)
- *Not Included in ESSER or HEERF FACCR*
 - #84.425B Discretionary Grants: Rethink K-12 Education Models Grants
 - #84.425G Discretionary Grants: Reimagining Workforce Preparation Grants
 - #84.425W American Rescue Plan Elementary and Secondary School Emergency Relief – Homeless Children and Youth
 - #84.425Y American Rescue Plan American Indian Resilience in Education (AIRE)

ESF is one program broken down into lettered pieces. Each lettered portion of the expenditures should be listed on the SEFA and then a total for the program as a whole. The program as a whole, including all its parts, should be treated as a single program for reporting purposes and major program determinations under Assistance Listing Number 84.425 Education Stabilization Fund.

This program is NOT a Cluster and should not be labeled as such on the SEFA or the DCF.

Consolidation of Administrative Funds (SEAs and LEAs)

ESEA programs in this Supplement to which this section applies are Title I, Part A (84.010); MEP (84.011); CSP (84.282); 21st CCLC (84.287); Title III, Part A (84.365); Title II, Part A (84.367); and Title IV, Part A (84.424A) including the Stronger Connections Grant (84.424F).

This section also applies to ESSER, GEER, and EANS (84.425C, D, R, U, and V).

State and local administrative funds that are consolidated (as described in III.A.1, “Activities Allowed or Unallowed – Consolidation of Administrative Funds (SEAs and LEAs)”) should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2)

completing the Schedule of Expenditures of Federal Awards (SEFA). A footnote showing, by program, amounts of administrative funds consolidated is encouraged.

(Source: 2025 OMB Compliance Supplement, Part 4, Department of Education Crosscutting Procedures)

Lost Revenue Under HEERF

In March 2021, the U.S. Department of Education updated its guidance on lost revenue under HEERF. The prior guidance required all lost revenue be supported with allowable expenditures which did not include replacement of revenue. In the updated guidance, which applies retroactively to the beginning of the program, lost revenue was added as one of the allowable uses of all HEERF institutional funds and is applicable to CARES (HEERF I), Consolidated Appropriations Act (HEERF II), and ARP HEERF (HEERF III).

The U.S. Department of Education's [FAQs](#) indicate lost revenue evaluations must be associated with the coronavirus pandemic and can be made back to the March 13, 2020 national emergency declaration.

FAQ #2 states that reimbursement for lost revenue is allowable for the Institutional Portion program (assistance listing number 84.425F) and the (a)(2) and (a)(3) programs (assistance listing numbers 84.425J, K, L, M, and N) for HEERF grant funds received under:

- *The Coronavirus Aid, Relief, and Economic Security (CARES) Act (HEERF I);*
- *The Coronavirus Response and Relief Supplemental Appropriations Act, 2021 (CRRSAA) (HEERF II); and*
- *The American Rescue Plan (ARP) (HEERF III).*

Reimbursement for lost revenue is not an allowable use of funds for the Student Aid Portion program (assistance listing number 84.425E) under HEERF I, HEERF II, or HEERF III or the Proprietary Grant Funds to Students program (assistance listing number 84.425Q), as those grant programs may be used only to provide financial aid grants to students.

FAQ #12 states, the incurring of the "cost" of lost revenue on an institution's HEERF grant award does not need to be assigned to any costs or expenses that the institution will pay using the amount of lost revenue since the allowable cost in the HEERF grant programs is the reimbursement of the lost revenue itself.

Allowable sources of lost revenue include tuition, room, board, fees, summer camps, bookstore, parking, and various other auxiliary services, to name a few (see FAQ #3). Lost revenue does not have to be associated with, or netted against, expenses and is considered an allowable use (type of expenditure) for quarterly and annual reporting to ED and on the Schedule of Expenditures of Federal Awards (SEFA).

FAQ #9 indicates that institutions who claim students who have dropped classes as lost revenue cannot also provide those same students with tuition reimbursement. Auditors should verify institutions meet these restrictions if lost revenue is claimed.

Middle Mile Funding Passed through Management Council of Ohio Education Computer Network (MCOECN)

MCOECN passed ESSER II Middle Mile ITC Upgrade funding (AL #84.425D) to ITCs and select urban school districts in fiscal years 2023 and 2024. MCOECN determined that the ITCs and urban school districts are subrecipients of the funding therefore the funding is subject to single audit requirements.

Based on the wording of the subrecipient agreements and the substance of the relationships between MCOECN and the subrecipients, in most instances the only compliance requirement passed down to these subrecipients is Section F: Equipment and Real Property Management. However, auditors should review the individual subrecipient

agreement to verify the facts and circumstances don't warrant a different conclusion should this program be tested as a major program.

Reaching All Students Program

If a school received funding through the Reaching All Students program, auditees and auditors should review the Notice of Award to verify the appropriate fund and Assistance Listing Number for the program. See also the listing of [schools awarded the grant](#).

The Innovative Workforce Incentive Grant I and Innovative Workforce Incentive Grant II, passed through the Ohio Department of Education and Workforce, should be reported under Assistance Listing # 84.425D.

(Source: Ohio Department of Education and Workforce (DEW))

Major Program Determination

Many auditees will have received and expended funds under multiple ESF subprograms. For major program purposes, auditors must evaluate 84.425 in its entirety. All ESF subprogram expenditures, even those expenditures of subprograms not addressed in this ESF Compliance Supplement, must be considered as part of the ESF program for major program determination purposes.

Identifying Subawards on the SEFA and Data Collection Form

For purposes of SEFA and Data Collection Form (Form SF-SAC) reporting, auditees should identify the individual subprogram(s) the funds were expended under, including each separate Assistance Listing Number (ALN) with the applicable alpha character. A total for the ESF in its entirety should also be provided. Auditees may need to determine which subprogram funds were expended through review of grant documents and inquiry of the source agency.

In order to identify more precisely subprogram expenditures, while also incorporating guidance issued by OMB on separately identifying COVID-19 expenditures, ED issued a memo to grantees on August 4, 2021, requesting that auditees include on the Federal Awards page of the Data Collection Form: (1) whether the program is novel coronavirus 2019 (COVID-19) relief assistance; and (2) the subprogram Assistance Listing Number alpha.

Therefore, to apply this requirement to the ESF subprograms, on the Federal Awards workbook for the submission, under Column D: Additional Award Identification, include the phrase "COVID-19" to be consistent with OMB's guidance in Appendix VII of the Compliance Supplement. Then place a comma (,) after COVID-19 and include the full Assistance Listing number and capitalized alpha character (A, B, C, etc.)

Example: A grantee listing the program "Higher Education Emergency Relief Fund – Student Aid Portion" (ALN 84.425E) on the SEFA would complete the Federal Awards page of the Data Collection Form in the following manner:

A	B	C	D	E
Award Reference (auto-generated)	Federal Agency Prefix	ALN Three-Digit Extension	Additional Award Identification	Federal Program Name
1	84	425	COVID-19, 84.425E	COVID-19 Education Stabilization Fund

Note: Please note the inclusion of “COVID-19, 84.425E” in column D for the COVID-19 Higher Education Emergency Relief Fund – Student Aid Portion subprogram.

Consolidation of Administrative Funds (SEAs and LEAs)

State and local administrative funds for ESSER, GEER, and EANS (84.425C, D, R, U, and V) that are consolidated (as described in Part 4 ED Cross-Cutting, III.A.1, “Activities Allowed or Unallowed – Consolidation of Administrative Funds (SEAs and LEAs)”) should be included in the audit universe and the total expenditures of the programs from which they originated for purposes of (1) determining Type A programs and (2) completing the Schedule of Expenditures of Federal Awards (SEFA). A footnote showing, by program, amounts of administrative funds consolidated is encouraged.

(Source: 2025 OMB Compliance Supplement, Part 4, Department of Education, ESF Introduction)