

Raising Subrecipients “CRF IQ” Helps Counties Streamline COVID-19 Response and Meet Tight Program Timelines

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The Coronavirus Aid, Relief, and Economic Security (CARES) Act appropriated \$150 billion to the Coronavirus Relief Fund (CRF) for States and local governments to help pay for expenditures incurred in responding to or mitigating the impacts of the COVID-19 public health emergency. While CRF has proven to be a significant remedy for resource-strapped local governments, applying the funds has presented considerable challenges. One of the biggest is CRF's aggressive timeline. The law was passed in March, the funding was distributed in late May, and the funds need to be expended by the end of 2020.

Acting as prime recipients of CRF allocations, counties face a daunting task of managing a large community of CRF funding subrecipients – each with diverse programs and services. Within a tightly compressed program performance period – March 1 to December 30, 2020 – counties must ensure that each subrecipient is able to implement a compliant program, execute an effective monitoring plan, complete required expense reporting and record retention and prepare an audit-ready closeout. The task becomes more complex when a county extends fund allocation beyond public health programs to those with broader public impact such as school closures, business disruption, unemployment and distance learning.

In order to effectively manage a complex portfolio of CRF programs within the mandated timeline, county leaders must work to streamline subrecipient program expenditure tracking and reporting. One approach that is proving effective is comprehensive CRF training for both subrecipients and internal program management staff. CRF education offered at the local level is helping build subrecipient capacity in standing up and managing programs. Counties providing the training have been able to create a consistent approach to program monitoring, documentation and reporting that keeps county staff, subrecipients and auditors on the same page.

The most effective CRF training curriculum is structured to meet varying levels of experience with Federal funding programs. A good starting point is an introductory overview of CARES ACT/CRF, along with the local county's COVID-19 response ordinances, to familiarize participants with the unique characteristics of CRF and how it differs from traditional federal funding sources. The curriculum can then build on the introduction to provide more detailed guidance on CRF requirements and best practices for eligibility determination, program monitoring, performance measurement, risk management, record retention, reimbursement request documentation and audit preparation.

As the participants progress through the training, the course should introduce more nuanced aspects of program management, including identifying and preventing potential duplication of benefits in programs that receive funding from multiple sources. Participants should also learn how to demonstrate the impact

of their programs on COVID-19 containment and community recovery, and methods of quantifying unmet needs to justify program expenditures. A truly comprehensive training program will also provide compliance guardrails to help subrecipients ensure that less conventional service programs meet the Federal eligibility requirement of being a “necessary and unmet” COVID-19 related need.

Taking a stepwise approach to educating subrecipients on CRF program development and management, taught by people with hands on experience, will improve subrecipient program monitoring and tracking and reporting. Counties that offer this training should see a notable reduction in the number of report and documentation revisions and minimal duplication of benefits issues. Greater accuracy and efficiency will streamline reimbursement request submissions, accelerated time to approval and increase the probability of a smooth program audit.

With a clear understanding of CRF and the county’s reporting processes and timelines, subrecipients will be able to adapt their programs to meet the timelines for delivery, monitoring, reporting and audit preparation. They should also be able to effectively package program reimbursement requests to meet federal eligibility and ensure audit compliance.

Ultimately, raising the “funding IQ” of all the participants in CRF funded programs helps expedite services that optimize COVID-19 containment and help minimize community and business disruption. A solid CRF training curriculum will also provide a strong foundation for implementing new COVID-19 response and recovery programs and services should future Federal funding become available.

About Vanessa Brower

Vanessa has over two decades in managing complex projects and evaluating data collected through task analysis, business process review, surveys and workshops. Her advanced experience with operational analysis, design and understanding of integrated, interdependent, and interfaced systems and their impacts on each other has allowed her to develop and manage planning processes for FEMA Long Term Community Recovery planning services in Texas, Alabama, Florida, Louisiana, Mississippi, New York and Pennsylvania.

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