



COMMUNITY SCHOOL TRAINING

Aug. 4, 2021

Ohio Auditor of State

Virtual Training

6.6 CPE HOURS

OHIO AUDITOR OF STATE KEITH FABER



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Columbus, Ohio 43215
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Annual Community School Training **Wednesday, August 4, 2021** **Agenda and Course Descriptions** ***Information subject to change***

School Funding Update

Presenter: Aaron Rausch and Elena Sanders, Ohio Department of Education
Description: This session will provide an overview of the state funding changes for FY22 and beyond.

COVID Relief for School Districts: ESSER I, ESSER II, and ARP ESSER

Presenter: Karen Auble and Morgan Brown, Ohio Department of Education
Description: The Office of Federal Programs will provide updates on the COVID relief funds available for school districts. Staff will discuss the implementation being done at the state level, review the guidance being developed, share resources and support and address questions.

What is a Single Audit and Single Audit Update

Presenter: Teresa Hicks, Ohio Auditor of State
Description: This session will provide a description of a single audit and when they are required. We will also provide an update on the latest federal funding sources and requirements.

2021 Ohio Compliance Supplement (OCS) Update

Presenters: Kelly Berger-Davis, Ohio Auditor of State
Description: Ohio Law requires audits of each public office. These audits help determine whether the government's financial statements are fairly presented and whether management has complied with significant laws and regulations. The Auditor of State's Ohio Compliance Supplement contains certain laws and regulations which are of considerable public interest, or are of the type auditors generally consider direct and material. This session will cover the most significant edits to the 2021 OCS which are applicable to community schools.

Hot Topics – Common Audit Issues

Presenter: Zac Morris, CPA and Morgan Helmick, CPA, Rea & Associates, Inc.

Description: During this session, we will be summarizing common compliance and recommendations noted in community school audits. These will include topics such as FTE/Calendar testing items, FTE adjustments, Medicaid School Program, and common issues in footnote reporting by the school operator.

Community School Fraud Red Flags and Prevention

Presenter: Darrin Batchelder and Max Uhl, Ohio Auditor of State


Description: This session will identify red flags and schemes for fraud specific to community schools and provide recommendations to lessen fraud risk. We will also provide an overview of the Ohio Auditor of State's Special Investigations Unit (SIU) and offer examples of investigations of community schools our unit conducted.

2021 Community School Training
Wednesday, August 4, 2021
Agenda

Start Time	End Time	Topic	Speaker
8:30 AM	8:45 AM	Opening Remarks	Training, AOS
8:45 AM	9:45 AM	School Funding Update	Aaron Rausch & Elena Sanders, ODE
9:45 AM	10:00 AM	Break	
10:00 AM	11:00 AM	COVID Relief for School Districts: ESSER I, ESSER II, and ARP ESSER	Karen Auble & Morgan Brown, ODE
11:00 AM	12:00 PM	Lunch	
12:00 PM	12:50 PM	What is a Single Audit?/Single Audit Update	Teresa Hicks, AOS
12:50 PM	1:00 PM	Break	
1:00 PM	1:50 PM	2021 Ohio Compliance Supplement (OCS) Update	Kelly Berger-Davis, AOS
1:50 PM	2:00 PM	Break	
2:00 PM	3:00 PM	Hot Topics - Common Audit Issues	Morgan Helmick & Zac Morris, Rea & Associates
3:00 PM	3:10 PM	Break	
3:10 PM	4:00 PM	Community School Fraud Red Flags and Prevention	Max Uhl & Darrin Batchelder, AOS
4:00 PM	4:15 PM	Closing Remarks	Training, AOS

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ODE School Funding Update



August 4, 2021

Ohio Department of Education

Increased Funding for K-12 Education

- Compared to estimated FY21 spending, HB 110 increases state spending on K-12 Education by **\$534.7 million (5.6%)** in FY22 and an additional **\$203.8 million (2.0%)** in FY23.
- The final passed budget adds an additional **\$1.28 billion** in new state spending in the 22-23 biennium compared to estimated FY21 spending.

Note: State spending is comprised of GRF, Lottery, and Dedicated Purpose Funds with GRF cash transfers.

Ohio Department of Education

School Funding – Key Changes

- Implements the Fair School Funding Plan for FY22 and FY23.
- Direct funding for Community Schools, STEM Schools, Scholarship Programs, and Open Enrollment (fund students where they are educated).
- Establishes a base cost methodology based on student teacher ratios, minimum staffing levels, and actual costs.
- Implements a new state and local cost methodology using property and income for all districts.
- Revises categorical aid and restricts funds for subgroups.

Ohio Department of Education

Base Cost

Current Law

- Since the 2013-14 school year, this element of the formula is referred to the **opportunity grant or formula amount**.
- In FY19, the per-pupil amount was \$6,020.
- Calculated based on the current year ADM (formula ADM).
- The per-pupil amount has received criticism because it is not connected to the actual cost of educating a student.

As Passed in HB 110

- Using an input-based and professional judgement approach to a **base cost**.
- Each school and district will generate a **different base cost amount**.
- The Legislative Service Commission (LSC) estimates that, as included in HB 110, the average base cost per pupil will be **\$7,202 (when fully phased-in)**.

Base Cost

- The practitioner developed base cost model uses actual district costs (teacher salaries, average expenditures across districts), establishes minimum service levels, and student-teacher ratios to calculate a unique base cost for each district. Base cost funding includes five areas:
 - Teacher Base Cost
 - Student Support (including a restricted Student Wellness and Success component)
 - District Leadership & Accountability
 - Building Leadership & Operations
 - Athletic Co-Curricular (contingent on participation)

Base Cost

- Community Schools are funded using the same salary and cost data that is used for traditional districts.
 - Teacher Base Cost Includes Funding for the Following
 - Teachers (ratios based on KG, 1-3, 4-8, 9-12, and CTE)
 - Special Teachers (unlike traditional districts, there is no minimum staffing level for Community Schools)
 - Substitute Teacher Costs (5 days per teacher)
 - Professional Development (4 days per teacher)
 - Remaining elements based on statewide average cost per pupil from traditional district calculation.

Categorical Aid

Current Law

- Provides additional funding for:
 - Targeted Assistance
 - K-3 Literacy
 - Economically disadvantaged students (restricted funding)
 - English learners (3 categories)
 - Students with disabilities (6 categories – restricted funding)
 - Career-Technical Education (5 categories – restricted funding)

As Passed in HB 110

- Provides additional funding beyond base cost for:
 - Targeted Assistance Eliminated
 - K-3 Literacy Funding Eliminated
 - Economically disadvantaged students (increased per pupil amount - \$272 to \$422, no connection to resident district, and renamed disadvantaged pupil impact aid)
 - English learners – restricted, expanded and converted to weights
 - Students with disabilities – increased per pupil amounts and converted to weights
 - Career-Technical Education – converted to weights

Student Wellness and Success Funding

Current Law

- Student Wellness and Success Funding is a stand-alone item designed to serve all students.
 - May be used for certain designated initiatives, based on a plan developed with two community partners.
- Per-pupil funding scaled based on census poverty data.

As Passed in HB 110

- Moves Student Wellness and Success Funding initiative into the DPIA funding.
- Allows funds to be spent on certain initiatives, including those previously designated under the Student Wellness and Success Funding.
- Requires that schools and districts develop implementations plans with a community partner as to how they plan to use these DPIA funds. This is like the requirement that existed under the stand-alone Student Wellness and Success.
- Unspent funds from FY20 and FY21 continue to be restricted for SWSF purposes.

Transportation

- Community Schools that Elect for Transportation will be funded on a statewide cost per rider amount.
- No longer connected to district funding levels.
- FY20 Statewide Average Cost Per Rider \$1,077.
- Funding calculated using T-1 and T-2 data reporting (not EMIS reporting).
- Deadline to accept responsibility for transportation extended from January 1 to August 1.

Eliminated Funding Components

- Targeted Assistance
- K-3 Literacy
- 3rd Grade Reading Proficiency Bonus
- High School Graduation Bonus

E-School Funding

- Base Cost
- Special Education
- Career-Technical Education
- Community School Facilities (\$25 per pupil)
- Continued funding for e-school pilot for existing pilot schools.

Phase-In Approach

- While House Bill 110 does not include a cap – the full amount calculated by the formula is not paid out to schools and districts. This is executed through a phase-in.
 - Most components subject to, “general phase-in percentage” of 16.67% in FY22 and 33.33% in FY23.
 - DPIA phased in at 0% for FY22 and 14% for FY23. (does not apply to Community Schools)
 - Transportation funding not subject to phase-in.
 - **Community Schools and STEM schools subject to general phase-in (new)**

Formula Transition Supplement

- Community schools are guaranteed (on a per pupil basis) to FY21 funding *prior to the executive budget reductions.*
- Net State Funding without facilities funding or ESC transfers.

FUNDING COMPONENTS:	
A Opportunity Grant:	\$703,587,181.54
B Targeted Assistance:	\$22,071,931.50
C K-3 Literacy Funding:	\$9,483,881.60
D Economic Disadvantaged Funding:	\$59,647,803.46
E English Learners (EL) Funding:	\$6,922,807.49
F Special Education Additional Funding:	\$126,651,324.84
G Career Tech Education Funding:	\$25,882,289.35
H Transportation Funding:	\$1,544,642.12
.....	
I Total Funding (A+B+C+D+E+F+G+H):	\$952,991,881.90
.....	
ADDITIONAL AID ITEMS (Not deducted from School Districts):	
.....	
Facilities Funding (Excludes):	
.....	
ESC Contract Deduction:	\$952,991,881.90
L Graduation Bonus:	\$1,400,511.10
M 3rd Grade Reading Bonus:	\$0.00
N Student Wellness and Success Funding:	\$29,009,673.37
.....	
O Total Net State Funding (I+J+K+L+M+N):	\$1,003,116,277.64

School Funding Related Changes

- Provides additional funding for:
 - Catastrophic Cost Reimbursement (withholds a portion of special education funding)
 - Quality Community School Support (\$54 million)
 - Community School Facilities Funding – increases per pupil amount from \$250 to \$500 per pupil (\$42.0 million)
 - Provides funding for Industry Recognized Credentials - Reimbursement and Incentive Funding (\$20.5 million annually)
- Establishes new funding for:
 - Career Awareness and Exploration (transferred to Career-Tech Planning District) \$2.50 per pupil in FY22 and \$5 per pupil in FY23

LSC Simulation and Considerations

- LSC Simulation based on FY20 data.
- Does not include community school facilities or quality community school support funding.
- Does not reflect transfer of Career Awareness and Exploration Funds.
- Does not reflect withholding 10% of special education funding for catastrophic cost reimbursement fund.
- ODE does not anticipate releasing simulations prior to the October payment.

Implementation of HB110

- Data elements frozen based on June data through September.
- Updated community school facilities per pupil amount in August.
- Evaluation of SOES as a result of direct funding.
- Full implementation by October
 - Revised payment reports
 - Move to updated calculations
 - Move to current year data

Let's Stay Connected



Aaron.Rausch@education.ohio.gov



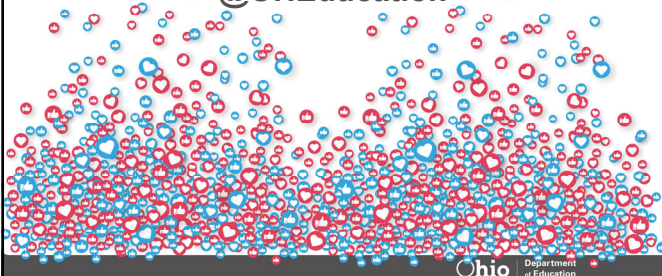
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YouTube



@OHEducation



**Share your learning
community with us!**
#MyOhioClassroom

Celebrate educators!
#OhioLovesTeachers


Ohio Department of Education

Link to LSC Simulation Spreadsheet:

<https://ohioauditor.gov/trainings/HB110H1-with-HC2083-1-4-20-21-final.xlsx>

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COVID Relief for School Districts and Community Schools: ESSER I, ESSER II and ESSER III



August 2021

Ohio Department of Education

Ohio
Department of Education

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Welcome and Introductions

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Learning Objectives

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CARES Act - ESSER I,

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CRRSA Act – ESSER II

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American Rescue Plan – ESSER III

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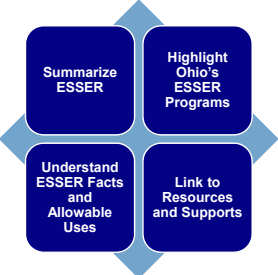
Supports

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Facilitated Q & A

Ohio Department of Education

Learning Objectives



Ohio Department of Education

ESSER I

- Coronavirus Aid, Relief, and Economic Security Act (CARES) Act, passed March 27th, 2020.
- Elementary and Secondary School Emergency Relief Fund (ESSER).
 - Purpose: Provide support to Local Educational Agencies (LEAs) to address the impact that the novel Coronavirus Disease 2019 (COVID-19) has had, and continues to have, on elementary and secondary schools.
 - ESSER (National): \$13.2 billion
 - ESSER (Ohio): \$489.2 million

ESSER II

- Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, signed December 27, 2020.
 - ESSER II (National): \$54.3 billion
 - ESSER II (Ohio): \$1.9 billion

ESSER III (ARP ESSER)

- American Rescue Plan Act of 2021, \$1.9 trillion, passed on March 11, 2021
 - ARP ESSER (National): \$122.9 billion
 - ARP ESSER (Ohio): \$4.4 billion

ESSER III – Additional Requirements*

- Plans posted to LEA website and sent to continuityplans@education.ohio.gov:
 - Safe Return Of In-Person Instruction and Continuity of Services Plan (by June 24)
 - ARP ESSER Plan (by August 20)
- 20 Percent Requirement for Addressing Learning Loss
- Maintenance of Equity

* LEAs should be prepared to meet additional policies, as requested by the SEA

ESSER III – Learning Loss

Not less than 20 percent of the LEA's total ARP ESSER allocation will be used to address learning loss through the implementation of evidence-based interventions, such as:

- Summer learning or summer enrichment
- Extended day, comprehensive afterschool programs
- Extended school year programs
- Other evidence-based interventions

Guidance: <https://www2.ed.gov/documents/coronavirus/reopening-2.pdf>

ESSER III – Maintenance of Equity

LEAs must not, in fiscal year 2022 or 2023—

- (A) reduce per-pupil funding (from combined State and local funding) for any high-poverty school ...
- (B) reduce per-pupil, full-time equivalent staff in any high-poverty school ...

This requirement does not apply to an LEA in fiscal year 2022 or 2023 that meets at least 1 of the following

criteria:

- (A) LEA has a total enrollment of less than 1,000 students
- (B) The LEA operates a single school
- (C) The LEA serves all students within each grade span with a single school
- (D) The LEA demonstrates an exceptional or uncontrollable circumstance, such as unpredictable changes in student enrollment or a precipitous decline in the financial resources

Guidance: <https://oese.ed.gov/files/2021/06/21-0099-MOEq-FAQs-FINAL.pdf>

ARP ESSER Timeline

ODE	LEA
<ul style="list-style-type: none">• May 24, 2021: Allocations released (2/3 of total ARP award) to LEAs to begin budgeting• June 7, 2021: Submit state ARP plan to USED• July 21, 2021: Remaining 1/3 of Ohio's ESSER award released to LEAs	<ul style="list-style-type: none">• By May 17, 2021: Submit assurances• By June 24, 2021: Post continuity of services plan on website• By August 20, 2021: Complete and submit entire APR ESSER application; post plan to website

ESSER Allowable Uses

- Activities authorized under ESEA, IDEA, Perkins, McKinney-Vento subtitle B, Adult Education and Family Literacy Acts.
 - b) Coordinate preparedness and response efforts of LEA with state, local, Tribal, and territorial public health departments and other relevant agencies to prevent, prepare for, and respond to COVID-19.
 - c) Activities to address unique needs of low-income students, students with disabilities, English learners, racial and ethnic minorities, students experiencing homelessness, foster youth.
 - d) Develop and implement procedures and systems to improve the preparedness and response efforts of LEA.
 - e) Training and PD for staff of LEA on sanitation and minimizing spread of infectious diseases.
- (continued)

ESSER Allowable Uses

- f) Purchase supplies to clean and sanitize facilities of the LEA.
 - g) Planning for and coordinating during long-term closures (meals, technology, IDEA, and other educational services provided consistent with Federal, state, local requirements).
 - h) Purchase educational technology (including hardware, software, and connectivity) for students served by LEA, including low-income and IDEA.
 - i) Provide mental health services and supports.
 - j) Plan and implement summer learning and supplemental afterschool activities.
 - k) Addressing learning loss by: administering and using high-quality assessments to assess students' academic progress and meet students' academic needs, including through differentiating instruction; implementing evidence-based activities to meet the comprehensive needs of students; providing information and assistance to parent and families on how they can effectively support students, including in a distance learning environment; and/or tracking student attendance and improving student engagement in distance education.
- (continued)

ESSER Allowable Uses

- l) School facility repairs and improvements to enable operation of schools to reduce risk of virus transmission and exposure to environmental health hazards, and to support student health needs.
- m) Inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities, including mechanical and nonmechanical heating, ventilation, and air conditioning systems, filtering, purification and other air cleaning, fans, control systems, and window and door repair and replacement.
- n) Provide principals and other school leaders with resources necessary to address needs of their individual schools.
- o) Other activities necessary to maintain the operations and continuity of services in the LEA and continuing to employ existing staff of the LEA.

New! ESSER FAQs

The U.S. Department of Education released "Frequently Asked Questions: Elementary and Secondary School Emergency Relief Programs" in May 2021.

- A. Overview of ESSER funds.
- B. Reopening schools safely and promoting the health and safety of students, staff and the school community.
- C. Advancing educational equity in COVID-19 response.
- D. Using ESSER funds to support educators and other school staff.
- E. Additional fiscal considerations.

https://oese.ed.gov/files/2021/05/ESSER_GEER_FAQs_5_26_21_745AM_FINALb0cd6833f6f46e03ba2d97d30aff953260028045f9ef3b18ea602db4b32b1d99.pdf

COVID-19 Resources

- [CDC Guidance for COVID-19 Prevention in K-12 Schools](#)
- [COVID-19 Health and Prevention Guidance for Ohio K-12 Schools \(2021-22 School Year\)](#)

CCIP Document Library Links

- [ODE ARP ESSER FAQ](#)
- [USED ARP Fact Sheet](#)

Allowable Use: Five Questions

1. Will the proposed use of funds “prevent, prepare for, and respond to coronavirus”?
2. Is it an allowable use of funds under CARES/CRRSA/ARP?
3. Is it reasonable and necessary?
4. Does it promote equity?
5. Does it support returning students to the classroom?

Common Questions

What is the period of availability of ESSER?

Fund	Start Date	End Date
CARES/ESSER I	3/13/2020	9/30/2022
CRRSA/ESSER II	3/13/2020	9/30/2023
ARP/ESSER III	3/13/2020	9/30/2024

Common Questions

Do I need to follow the Uniform Grant Guidance (UGG) and Education Department General Administrative Regulations (EDGAR) for ESSER?

Yes. ESSER is governed by the Uniform Grant Guidance (UGG) and the Education Department General Administrative Regulations (EDGAR). Among other requirements, all expenses paid with ESSER funds must be necessary and reasonable under the circumstances.

Common Questions

Can we fund new and existing staff with the ESSER funds?

Yes, funding new and/or existing staff is allowable under ESSER if these staff are in response to the impact that COVID-19 has had on the district and its schools.

It is important to note that there is no Supplement, Not Supplant requirement in any ESSER grants.

Common Questions

Should the LEA document how paying salaries for individuals is necessary to maintain continuity of operations?

Yes. The Ohio Department of Education would expect that the district document and be able to explain, upon request, how they are using the funds to maintain the operations and continuity of services.

Common Questions

Can we use ESSER funds for bonuses or merit pay?

Yes, a district could pay bonuses or merit-pay connected to COVID-related disruptions or closures. For example, a local educational agency (LEA) might use local ESSER funds to provide employees with additional pay to:

- Address recruitment or retention challenges in light of the pandemic,
- Provide additional compensation to teachers and other staff that work in-person,
- Provide additional compensation to teachers and other staff that have assumed new duties because of COVID

Common Questions

Can ESSER funds be used to construct buildings, if the building is needed in response to COVID-19?

ESSER funds may be used purchase real property and perform construction for improvements to land, buildings, or equipment that meet the overall purpose of ESSER, which is "to prevent, prepare for, and respond to" the COVID-19 pandemic.

Common Questions

What are allowable uses of ESSER for facilities renovations and improvements?

1. School facility repairs and improvements to enable operation of schools to reduce risk of virus transmission and exposure to environmental health hazards, and to support student health needs
2. Inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities

Common Questions

Can ESSER funds be used to make IT improvements?

Yes. For example, if an LEA needs to increase its use of technology, such as for potential temporary shifts to hybrid learning if COVID-19 cases arise, expanded cybersecurity needs to facilitate that activity may also be addressed using ESSER funds.

More Questions?

federalprograms@education.ohio.gov



Questions?

What is a Single Audit? Single Audit Update Community School Training

August 4, 2021

Presented by: Teresa Hicks, MBA
Auditor of State, Center for Audit Excellence

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What is a Single Audit?

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What We Will Be Covering

- Definition and Purpose of an Audit
- Audit Frequency
- Audit Where, When, and Who
- How to Prepare for an Audit
- How do Auditors Determine What to Test in a Single Audit
- COVID Funding Update



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What is an Audit and Why do I Have to Have one?

An Audit is...

Evaluation of the Financial Statements

Evaluation of Internal Control and Compliance

Purpose of an Audit...

Gain Assurance over Financial Statements

Add Credibility to Financial Statements

Express an Independent Opinion

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How Often Do I Need An Audit?

Ohio Law-biennial

Federal Single Audit - \$750,000 in Federal Expenditures

Anytime - Public Office Request or AOS Initiative

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Important Deadlines to Consider

DEADLINES

Financial Statement Filing Requirements

Single Audit Deadline

Other Regulator Deadlines

GFOA Comprehensive Annual Financial Report Deadline

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Reporting Items

- Schedule of Expenditures of Federal Awards (SEFA)
- Notes to the SEFA
- Data Collection Form - Federal Audit Clearinghouse

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Schedule of Expenditures of Federal Awards (SEFA)

Prepared by the Client

Federal Grantor and Assistance Listing number are listed on the Federal awards.

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Schedule of Expenditures of Federal Awards (SEFA)

- List individual Federal programs by agency.
- Clusters must list Cluster and individual program names.
- Federal non-cash expenditures and cash expenditures are included for the year.
- Pass-through entity and identifying number assigned by the pass-through entity must be included.
- Total amount paid to subrecipients must be listed.
- COVID Funding must be identified separately.

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How Do You Know How Much Federal Funds You Spent?

It is **VERY IMPORTANT** that the Treasurer has a method in place to track federal expenditures!

As an example: Each federal grant is tracked in a separate fund & cost center. At year end, as part of closing out the books, the system requires the Treasurer to complete a Federal Expenditures summary to determine if it is over \$750,000.

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IMPORTANT NOTES!

Important

If the Charter School passes federal funds through to their Management Company to spend – the federal expenditures are determined when they are spent by the management company.

UG requires the auditee to prepare a schedule of expenditures of federal awards.

UG requires the auditor to determine and provide an opinion on, whether the auditee's schedule is presented fairly.

Auditors must be able to audit original records (i.e. when school utilizes a mgmt. co. auditors need mgmt. company records).

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Notes to the Schedule of Expenditures of Federal Awards (SEFA)

Prepared by the Client

Basis of Presentation

Summary of Significant Accounting Policies

Other information

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Schedule of Expenditures of Federal Awards (SEFA) and Notes

<https://ohioauditor.gov/references/practiceaids.html>

SINGLE AUDIT REPORT SHELLS

- Sample Corrective Action Plan Uniform Guidance 111KB
- Schedule of Expenditures of Federal Awards Uniform Guidance 111KB
- Notes to the Schedule of Expenditures of Federal Awards Uniform Guidance 41KB
- Schedule of Findings and Questioned Costs Uniform Guidance 28KB
- Schedule of Prior Findings and Questioned Costs Uniform Guidance 23KB

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Data Collection Form

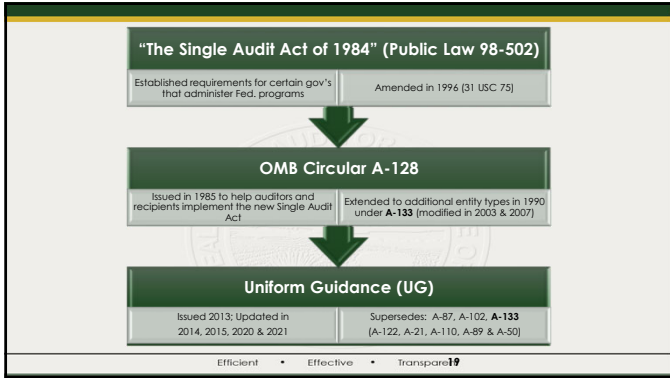
Auditor of State's portion is filled out on the Federal Audit Clearing house at the end of the audit by your managers.

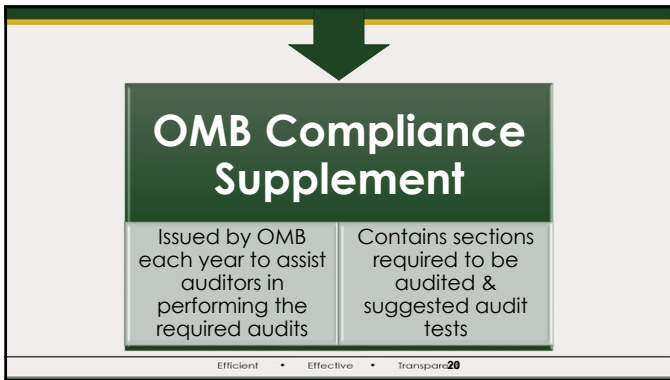
Data Collection form should agree to the Schedule of Expenditures of Federal Awards.

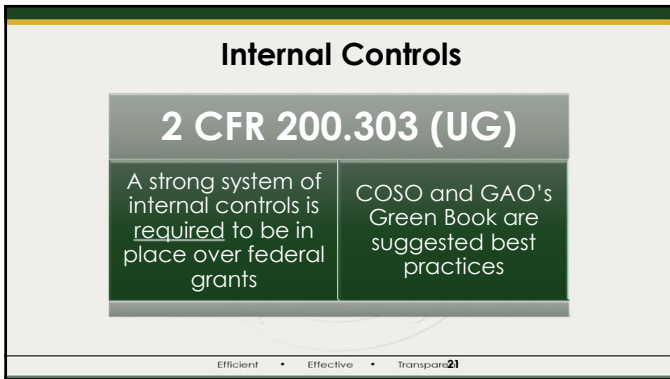
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How Do Auditors Determine What to Test in a Single Audit?

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12 Compliance Requirements

A Activities Allowed or Unallowed	B Allowable Costs / Cost Principles	C Cash Management
E Eligibility	F Equipment & Real Property Mgmt.	G Matching, Level of Effort, Earmarking

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12 Compliance Requirements

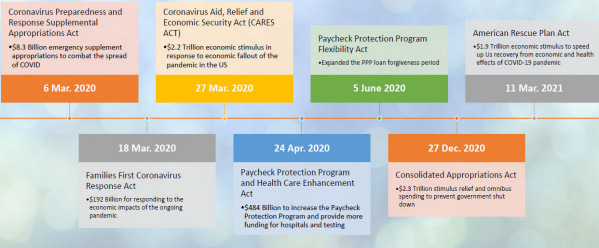
H Period of Performance	I Procurement, Suspension & Debarment	J Program Income
L Reporting	M Subrecipient Monitoring	N Special Tests & Provisions

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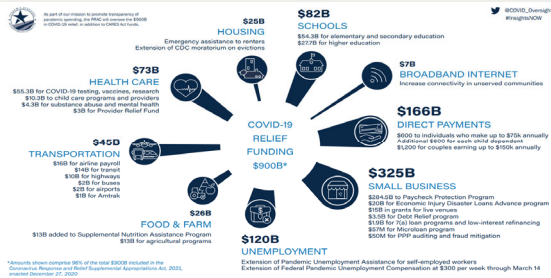
Agenda

- Coronavirus Aid, Relief, and Economic Security Act (CARES) H.R. 748
- Families First Coronavirus Response Act—H.R. 6201
- Coronavirus Preparedness and Response Supplemental Appropriations Act—H.R. 6074
- Paycheck Protection Program and Health Care Enhancement Act (P.L. 116-139)
- Consolidated Appropriations Act of 2021
- American Rescue Plan American Rescue Plan of 2021 (Public Law 117-2) passed 3/11/2021 - \$1.9 Trillion in COVID-19 Relief

COVID-19 Federal Funding Timeline



Consolidated Appropriations Act of 2021



Consolidated Appropriations Act

Coronavirus Relief Funds (CRF) (CFDA 21.019)
Deadline Extended

- Controlling Board extended the deadline for CRF funds OBM administers to **December 31, 2021**.
- ODE extended the deadline for CRF allocations to schools and the Broadband Ohio program as well.
- Limited Uniform Guidance applicability, Procurement does not apply.

Federal COVID-19 Programs for Schools

FIFO & Uniform Guidance Applies

- The CARES Act, Consolidated Appropriations Act of 2021 and American Rescue Plan have created three separate rounds of federal funding in programs originally established by the CARES Act.
- Each iteration of funding has slightly different requirements, therefore, each must be accounted for separately. Uniform Guidance applies to all programs and all three waves, including Procurement rules.
- Rule of thumb, you must spend ESSER I before ESSER II and then spend ESSER II before ESSER III.

CARES Act Established ESSER

ESSER I (84.425D)

<https://ccip.ode.state.oh.us/documentlibrary/default.aspx?ccipSessionKey=637595232943763764>

- ODE is responsible for administering ESSER I and is responsible for oversight.
- Allocated to School Districts and Community Schools.
- Record in **Fund 507**, USDE requires separate accountability.

Consolidated Appropriations Act

ESSER II (84.425D) allocation to schools

- May be used for allowable expenses from March 13, 2020 until September 30, 2022.
- Uniform Guidance applies, including Federal Procurement Rules.
- Allowable uses are fairly broad – twelve categories.
 - Anything that is allowable under ESEA, IDEA, Perkins, Adult Ed, McKinney; sanitizing buildings, mental health services, providing principals and other school leaders with resources needed to address the needs of their individual buildings, activities necessary to maintain continuity of services and continue employing existing staff, etc.

Consolidated Appropriations Act

ESSER II (84.425D) Allowable Uses

- ODE is allocating ESSER II to K-12 schools.
- Schools should record separately in a **SCC within Fund 507**, USDE requires separate accounting from ESSER I.
- Same allowable uses as ESSER I, plus...
- Additional allowable uses include addressing learning loss, preparing schools for reopening, testing, repairing and upgrading projects to improve air quality in school buildings.
 - USDE clarified these additional allowable uses are also allowable under ESSER I.

Consolidated Appropriations Act

ESSER II (84.425D) Allowable Uses

ODE and AOS strongly encourage schools to take time to **document** these considerations for ESSER II expenditures:

- Will the proposed use of funds “prevent, prepare for, and respond to coronavirus?”
- Is it an allowable use of funds under the legislation?
- Is it reasonable and necessary?
- Does it promote equity?

Consolidated Appropriations Act

ESSER II (84.425D) Allowable Uses

ESSER II is not a “lost revenue” grant. Some have been confused about this since “continuity of operations” is so broad.

- Can be used to supplant state and local funds.
- However, schools must still identify allowable expenses and allocate them to the ESSER II SCC of Fund 507.
- Schools must maintain documentation to support allowable expenses charged to the program.

American Rescue Plan

ESSER III (84.425D) Allowable Uses

- May be used for pre-award costs dating back to March 13, 2020.
- Available for obligations through September 30, 2023.
- Schools must reserve **not less than 20% of ARP ESSER allocation to address learning loss through the implementation of evidence-based interventions**, such as summer learning or summer enrichment, extended day, comprehensive after school programs or extended school year programs and ensure response to students’ academic, social and emotional needs, **addressing the disproportionate impact of COVID-19 on underrepresented student subgroups.**

American Rescue Plan

ESSER III (84.425D) Allowable Uses

- Remaining ESSER III funds may be used for the same allowable purposes as ESSER I and ESSER II, including hiring new staff and avoiding layoffs.
- ARP authorizes schools to use ESSER to develop strategies and implement public health protocols, including policies in line with CDC guidance for reopening and operation of school facilities.
 - Schools may also use ESSER I and ESSER II for these purposes even though CARES Act and Consolidated Appropriations Act of 2021 did not expressly authorize it.

CARES Act

Nutrition Cluster

- COVID-19 Nutrition programs Administered by ODE
- COVID-19 funding can be received under any Nutrition Cluster program – ODE assigns the schools' claims to COVID-19 funding after the schools' submission in CRRS.
- ODE then provides COVID-19 claiming information to schools for Federal Schedule reporting.
- Many Federal waivers are in effect in Ohio. Each school can vary on which waivers they qualify for.

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Consolidated Appropriations Act of 2021

Nutrition Cluster

- Provided Supplemental reimbursement for each individual month up to 55% of the difference in the reimbursements.
- ODE will complete the calculation and make payments. Entities need not apply. ODE anticipates payments being made in September.

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American Rescue Plan

Nutrition Cluster

- ODE will provide guidance as soon as it is made available.

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American Rescue Plan

Other ED Grants

- Education Homeless Children and Youth Fund
- Individuals with Disabilities Education Act (IDEA Part B)

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Federal COVID-19 Programs for Local Governments

Many new programs with historical amounts of Federal funding

- Must keep CARES Act and American Rescue Plan (ARP) funding segregated in separate funds.
 - FFATA and Ohio Rev. Code Chapter 5705 require this for most entities.
- Due to the unprecedented funding amounts, the risk of noncompliance and fraud will be high with this funding.
 - We anticipate Federal OMB will make ARP programs higher risk for audit (meaning, we may have to audit more).
- Governments have a responsibility to provide advance notice to its depository institution when a large increase in the account balances is expected. Failure to provide notice may result in under-collateralization.

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Consolidated Appropriations Act

- Emergency Rental Assistance Program I
- GEER II and HEERF II
- Additional funding for transit, state highways, airports
- Additional \$300 of Unemployment to March 14, 2021
- Funding for vaccine distribution, testing, tracing, and mental health
- Various Broadband programs

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American Rescue Plan

Assistance to States
and Local
Governments

- **State and Local Fiscal Recovery Funds** - Available for costs incurred beginning **March 3, 2021** through **December 31, 2024**.
- **Coronavirus Capital Projects Fund** - Available until expended.
- **Emergency Rental Assistance Program II** - Provided expanded assistance through September 30, 2027.
- **Homeowner Assistance Fund** - Available until Sept. 30, 2025, for qualified expenses.
- **GEER III and HEERF III**

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American Rescue Plan

- More funding in the following programs available through **Sept. 30, 2025**, unless otherwise indicated:
 - FEMA Disaster Relief Fund
 - Airport Assistance Grant (**Sept. 30, 2024**)
 - Federal Transit Administration grants for public transportation (**Sept. 30, 2024**)
 - Low Income Water and Home Energy Assistance (**Sept. 30, 2022**)
- There is also additional funding available in other areas, such as mental health, aging services, child care and development, etc.

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American Rescue Plan

- Emergency paid sick leave credits:
 - Grants state and local governments as well as Federal governmental instrumentalities that are tax-exempt 501(c)(1) organizations the ability to access the paid sick time and paid family leave credits under the FFCRA
 - Access to credits for leave provided March 31, 2021 through September 30, 2021

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Allocating Audit Costs to Federal Programs

- The Uniform Guidance in §200.425 allows "A reasonably proportionate share of the costs of audits required by, and performed in accordance with, the Single Audit Act Amendments of 1996 (31 U.S.C. 7501-7507), as implemented by requirements of this part, are allowable."
- However, some exceptions exist, including audits not performed in accordance with the Single Audit requirements (such as a performance audit) and audit costs for an entity which does not meet the single audit threshold of \$750,000.
- Therefore, the cost of your single audit may be considered an allowable cost, unless the terms and conditions of your grant award indicate otherwise. See **AOS Bulletin 2021-006 – Hourly Billing Rates and Allocation of Audit Costs**

Impact on Single Audits - Challenges

Federal OMB anticipates issuing 2021 Compliance Supplement in **more than 1 installment**:

1. General guidance and key programs and
2. New ARPA programs as they become available

Federal agencies still determining if they will create new program assistance listing numbers for programs stemming from Consolidated Appropriation Act or ARP Act.

When available, recipients should refer to the Assistance Listing for detail on the specific provisions of UG that do not apply to these programs.

- Separate accountability applies.

KEY

- DOCUMENT
- DOCUMENT
- DOCUMENT



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OHIO AUDITOR OF STATE
KEITH FABER



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2021 Ohio Compliance Supplement Update

Presented by: Kelly Berger-Davis, Center for Audit Excellence

Agenda

- What, Where, How, When
- Implementation Guide Updates
- Ch. 1 Updates
- Ch. 2 Updates
- Ch. 3 Updates
- OPM Updates



What is the OCS?

OCS = Ohio Compliance Supplement

Contains certain laws and regulations which are:
• of the type auditors generally consider direct and material
• or of considerable public interest

Is not a comprehensive listing of applicable laws and regulations

Is designed to help auditors and public offices identify and familiarize themselves with certain laws and regulations

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4

What is the effective date?

2021
OCS

Engagements of FYE 12/31/20 – 11/30/21

2020
OCS

Engagements of FYE 12/31/19 – 11/30/20

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Where is the OCS?

Reference Materials

Ohio Compliance Supplement Manual (PDF)

Exhibit 3 Compliance ACE (Microsoft Word)

Chapter 1 - Direct Laws (PDF)

Chapter 2 - Indirect Laws and Statutorily Mandated Fees (PDF)

Chapter 3 - Stewardship (PDF)

OCS Manual (Microsoft Word)

<http://www.ohioauditor.gov/references/compliancemanuals.html>

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How is the OCS Organized?

- Implementation Guide (IG)
- Chapter 1
 - Direct Laws - has the potential to materially misstate the financial statements.
- Chapter 2
 - Indirect Laws & Statutorily Mandated Tests
- Chapter 3
 - Stewardship
- Optional Procedures Manual (OPM)

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Updates – When/How Often? How to Identify Changes?

- Updated annually
- Normally posted Nov-Jan timeframe
- Changes marked with strike-out, double underline or wavy-underline

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2021 OCS Updates

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2021 OCS Updates

Throughout

- **Red text** in OCS indicates a change related to COVID-19
- Removed references to the 2011 Yellow Book
- Changed 'CAFR' to 'Comprehensive Annual Financial Reports'
- Effective for federal awards made after November 12, 2020, the terms "Catalog for Federal Domestic Assistance (CFDA) number" and "CFDA program title" have been changed to the terms "Assistance Listings number" and "Assistance Listings program title".

2021 OCS Updates - IG

Finding for Recovery Clarification

- A FFR should be issued even if a criminal restitution order is already in place for the same conduct without a repayment plan. The following distinctions may be denoted as applicable:
 - Repaid Under Audit – if repaid 100%
 - Resolved – if repayment plan in place
- Only unresolved/unpaid FFR's from Section 2 of the p/y SOF are summarized in the Schedule of Prior Audit Findings. Those from Section 4 are not.

2021 OCS Updates - IG

Finding for Adjustment (FFA) Clarification

- Track p/y's material FFA in the Schedule Of Prior Audit Findings until appropriately recorded by client.
- If in subsequent audits, the issue that caused/allowed the material FFA to occur has:
 - Been corrected – do not repeat comment
 - Remains uncorrected – evaluate for f/s materiality & opinion modification
 - Remains uncorrected & additional errors occurred in current audit period that add to the FFA – report cumulative amount of the errors, including amounts from prior period, for the current period – and evaluate for f/s materiality & opinion modification
- A client not recording a necessary adjustment that requires an opinion modification should usually result in a material weakness / significant deficiency reported in the GAGAS report and the Schedule of Findings.

2021 OCS Updates – Ch. 1

1-12: Community School Debt ★

- Changed section from covering just CS foundation anticipation notes – to cover all community school debt.
- This section applies if the community school had any previous debt still outstanding/being repaid during the current audit period, **or** new money loaned **to/from** the school during the current audit period.

2021 OCS Updates – Ch. 1

1-12: Community School Debt (cont'd) ★

- A CS may borrow money from their operator, but such must be accounted for, documented & bear interest at a fair market rate.
- As mentioned in OCS 2-22, a community school's Treasurer should not loan money to a community school they work for, as this could violate Ohio Ethics Laws.

2021 OCS Updates – Ch. 1

1-12: Community School Debt (cont'd) ★

- CS's do not have legal authority to make loans to other community schools.
- A Finding for Recovery may be issued against the community school receiving the funds as part of the audit of the community school loaning the funds.

2021 OCS Updates – Ch. 1

1-12: Community School Debt – AOS Bull 2021-002 – impl. details: ★

- Effective upon issuance – 2/19/21
- For existing loans outstanding on 2/19/21, school may either:
 - Repay in full immediately, or
 - Continue to follow repayment plan

2021 OCS Updates – Ch. 1

1-12: Community School Debt – AOS Bull 2021-002 – implementation details: ★

- Existing loan not in writing by 2/19/21:
 - Put in writing by 4/20/21, or
 - Potential FFR

2021 OCS Updates – Ch. 1

1-12: Community School Debt – AOS Bull 2021-002 – impl. details: ★

- Eff. 2/19/21 citation &/or FFR may be issued:
 - For existing loans o/s where:
 - Loan payments are discontinued;
 - Loan agreement / covenants are not complied with; or
 - Repayment plan / loan doc. is altered
 - Auditors will continue to monitor repayments during each audit until repaid in full.
 - For any new loans made after 2/19/21

2021 OCS Updates – Ch. 1

1-20: Liability self insurance ★

- Reorganized testing section

2021 OCS Updates – Ch. 1

1-23: Collection of income tax at source on wages

- Medicare tax – added authority for crediting certain paid leave costs against the tax obligations related to various COVID statutes and/or deferring the tax obligations to future periods.
- IRS forms 1099 & 1096 - grants that local governments provide to small businesses under the CARES Act Coronavirus Relief Fund are taxable.
- Added to testing to determine if they properly credited the paid leave costs against the tax obligations and/or deferred the tax obligation to future periods.

2021 OCS Updates – Ch. 1

1-24: Definitions, rates of contributions etc.

- Auditors should be alert for changes in the account classification for related costs as compared to prior years because payments to cover payroll or benefits expenses of public employees for those employees whose work duties are substantially dedicated to mitigating or responding to the COVID-19 public health emergency may be charged to the Coronavirus Relief Fund.

2021 OCS Updates – Ch. 1

1-27A: Community school funding – Brick & Mortar Schools ★

- This section applies to B&M CS's operating in person as normal, **or** under a remote learning plan
- Auditors will perform alternative testing procedures.
- 133rd GA, HB 164, Section 16(B) allowed temporary remote learning plans for FY 2021 only
 - Section 16(F) – a community school that implemented such a plan shall be considered to have complied with 1.) min. # of hours req and 2.) any req's to receive state funds under ORC 3314

2021 OCS Updates – Ch. 1

1-27A: Community school funding – B&M (cont'd) ★

- As a result, for FY 2021 auditors will test as follows:
 - Controls – Have client complete form documenting learning model(s) used during FY 2021 per building/time period; as well as a narrative on controls over student attendance for each model utilized
 - If operated in person as normal all year – full testing procedures
 - If operated under a remote learning plan:
 - Step 1 - assess plan & walkthrough 1 student for 1 week.
- Steps 4, 5, 6, 7b & 8 - test as indicated in step.
- Steps 2, 3, 7a & 9 – no testing required for FY 2021.

2021 OCS Updates – Ch. 1

1-27B: Community school funding – E-Schools

- This section only applies to actual 'e-schools' – meaning those created under the definition in ORC 3314.02(A)(7).
- 1-27B should not be used for comm. schools established as a brick & mortar that utilized remote learning plans due to COVID during FY 2021.
- For e-schools, attendance should have been tracked in the same manner it was prior to COVID. E-schools continued to be funded based on documented learning opportunities. Auditors will therefore perform normal testing procedures.
- Excused and unexcused days of absence or assignments do not count as hours in e-schools.

2021 OCS Updates – Ch. 1

1-27C: Community school funding – Blended Schools

- This section applies to CS's operating in under blended learning declarations
- Full testing procedures apply
- Auditors must review ODE's document titled 'Methodology for funding blended learning community schools during the ordered school-building closure'.

2021 OCS Updates – Ch. 1

1-27C: Community school funding – Blended Schools

- Opening assurances are only required for community schools in their first year of operations, or schools that are not e-schools and changed buildings.
- Blended learning declaration form due to ODE by 11/1/2020

2021 OCS Updates – Ch. 1

1-27A, B & C: Community school funding

- Due to COVID-19, ODE may issue 1-year nonrenewable provisional licenses; however, no such license shall be valid on or after July 1, 2021.
- The original source document for a birth record may be a photocopy of a birth certificate or a properly attested documentation of birth.
- Table added to clarify difference between habitual truancy, excessive absences, & chronic absenteeism – and the related steps schools must take for each.
 - Community schools, e-schools, and dropout prevention and recovery schools must follow all requirements in the table.
 - Students may not be suspended or expelled for truancy, and this does **not** indicate a student must be automatically withdrawn.

2021 OCS Updates – Ch. 1

1-27A, B & C: Community school funding

- **In addition**, for community schools, ORC 3314 does require the following, which is a separate law from the categories in the table discussed on the prior slide:
 - 3314.03(A)(6)(b): the governing authority must adopt an attendance policy that includes a procedure for **automatically withdrawing** a student from the school if the student without a legitimate excuse fails to participate in seventy-two (72) **consecutive** hours of the learning opportunities offered to the student.
 - 3314.08(H)(2)(c): if the student, without a legitimate excuse, fails to participate in the first seventy-two (72) consecutive hours of learning opportunities offered to the student in that subsequent school year, the student shall be considered not to have re-enrolled in the school for that school year.

2021 OCS Updates – Ch. 2

2-3: Internet- or computer-based community school cannot contract with a nonpublic school for instructional facility space

- This section only applies to community schools which are classified as internet/e-schools.
- It does not apply to a brick & mortar or blended community school, which implemented a temporary remote learning plan for Fy 2021 due to COVID-19, as permitted under 133 GA H.B. 164, Section 16(B).

2021 OCS Updates – Ch. 2

2-5: Accounting for management company expenses

- Added clarification that **all** community schools meeting the threshold in ORC 3314.024(A) must include the management company detailed accounting in the footnote prescribed by Bulletin 2004-009 in their annual financial statements.
- AOS, pursuant to ORC 3314.024(D) and AOS Bulletin 2004-009, verifies information contained in the detailed accounting footnote by examining community school records during the course of the regular financial audit. This verification occurs through one of the three options explained in this section.

2021 OCS Updates – Ch. 2

2-5: Accounting for management company expenses (cont'd)

- IPA's can now check the AOS community school master spreadsheet in IPA portal for mgmt. co. name
- Management Co. AUP draft procedures & final reports are now submitted to CommunitySchoolQuestions@ohioauditor.gov
- AOS will attest to the sufficiency of the procedures **prior to** the practitioner ("auditor") commencing the procedures.
- Each AUP Report and engagement letter should list the schools to which the agreed-upon procedures apply.

2021 OCS Updates – Ch. 2

2-13: Sponsor monitoring of community schools

- Effective FY 2021, opening assurances are only required for new schools, or existing community schools that changed school buildings that year.
- If a remote learning plan was adopted, determine whether the sponsor reviewed/approved the plan.
- Sponsor ratings:
 - HB 164 prohibited ODE from issuing any sponsor ratings for Fy 2020, and established safe harbor from penalties and sanctions for sponsors based on the absence of such ratings, in which only ratings from previous and subsequent years be considered.
 - Per HB 67, sponsor ratings issued for Fy 2021 have no effect in determining sanctions or penalties; do not create a new starting point for determinations that are based on ratings over multiple years; and only certain components are rated.

2021 OCS Updates – Ch. 2

2-23: Ohio Sunshine Laws

- Clarified guidance & testing procedures from HB 404
- Effective 3/9/20 until 7/1/21, members of a public body may hold and attend meetings and may conduct and attend hearings by means of teleconference, video conference, or any other similar electronic technology.
- Step 2 now combines 3 tests into 1 sample

2021 OCS Updates – Ch. 2

2-25: Anti-Bullying Provisions

- Minor tweaks were made to this section to sync the wording up with the AUP wording

2021 OCS Updates – Ch. 3

3-1: Deposits of public money

- Added reference to AOS COVID FAQ's

2021 OCS Updates – Ch. 3

3-3: Appointments, compensation, contracts, etc.

- Due to COVID - during the period of 3/9/20 – 7/1/21; members of a public body may hold and attend meetings and may conduct and attend hearings by means of teleconference, video conference, or any other similar electronic technology

2021 OCS Updates – Ch. 3

3-3: Appointments, compensation, contracts, etc.

- The maximum number of governing authorities of **start-up** community schools on which a person can serve at the same time is five (unless the person serves in a volunteer capacity on all such boards, with no compensation under this section **and** the operator (if the school has one) is a nonprofit organization).
- A new start-up school means a community school other than one created by converting all or part of an existing public school or educational service center building, as designated in the school's contract
- However, per ORC 3314.02(B)(5), a school established as a conversion school that later changes to a sponsor that is not a traditional public school or ESC, shall then be deemed a start-up school.
- Auditors may check the AOS master community school spreadsheet for the schools designation as a start-up or conversion school.

2021 OCS Updates – Ch. 3

3-6: Community Schools - Dropout Prevention and Recovery School eligibility requirements

- Opening assurances are only required for community schools in their first year of operations, or schools that are not e-schools and changed buildings.
- HB 67 prohibits ODE from publishing state report card ratings for Fy 2021.
- The requirement for FY 2020 state testing was removed by the legislature, and subsequent federal waiver, due to the COVID-19 pandemic.
 - For Fy 2021 – HB 67 removed the American History end-of-course requirement.

2021 OCS Updates - OPM

O-27: Allocating audit costs

- Added reference to AOS Bulletin 2020-005
 - Generally, the percentage of costs charged to federal awards for a single audit shall not exceed the percentage derived by dividing federal funds expended by total funds expended by the recipient or sub-recipient (including program matching funds) during the fiscal year.
 - The percentage may be exceeded only if appropriate documentation demonstrates higher actual costs.
 - Other audit costs are allowable if specifically approved by the awarding or cognizant agency as a direct cost to an award or included as an indirect cost in a cost allocation plan or rate.

2021 AOS Community School Training
2021 OCS Update

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Hot Topics – Common Audit/AUP Issues

Zac Morris, CPA - Principal
Morgan Helmick, CPA - Senior Manager



Common ORC Citations

- ORC 149.43 – Availability of public records for inspection and copying
 - <https://codes.ohio.gov/ohio-revised-code/section-149.43/9-7-2021>

• (A) As used in this section:

(1) "Public record" means records kept by any public office, including, but not limited to, state, county, city, village, township, and school district units, and records pertaining to the delivery of educational services by an alternative school in this state kept by the nonprofit or for-profit entity operating the alternative school pursuant to section [3313.533](#) of the Revised Code.

Common ORC Citations

- ORC 149.43 – Availability of public records for inspection and copying (continued)

- Items typically reviewed in testing
 - Public Record Policy
 - Records Retention Schedule
 - Certificates of Annual Public Records Training
 - Public Record Requests
 - Promptly prepared
 - Provide explanation for denial
 - Notify requestor of redacted information or make plainly visible

Common ORC Citations

ORC 9.38 Deposits of Public Money

- <https://codes.ohio.gov/ohio-revised-code/section-9.38>

A person who is a state officer, employee, or agent shall pay to the treasurer of state all public moneys received by that person as required by rule of the treasurer of state adopted pursuant to section 113.09 of the Revised Code. A person who is a public official other than a state officer, employee, or agent shall deposit all public moneys received by that person with the treasurer of the public office or properly designated depository on the business day next following the day of receipt, if the total amount of such moneys received exceeds one thousand dollars. If the total amount of the public moneys so received does not exceed one thousand dollars, the person shall deposit the moneys on the business day next following the day of receipt, unless the public office of which that person is a public official adopts a policy permitting a different time period, not to exceed three business days next following the day of receipt, for making such deposits, and the person is able to safeguard the moneys until such time as the moneys are deposited.

Common ORC Citations

ORC 9.38 Deposits of Public Money (continued)

- Items typically reviewed during testing
 - Cash collections
 - Comparing date collected vs date deposited with fiscal agent/designated depository

Common ORC Citations

ORC 3301.0714 Guidelines for statewide education management information system

- <https://codes.ohio.gov/ohio-revised-code/section-3301.0714>

(A) The state board of education shall adopt rules for a statewide education management information system. The rules shall require the state board to establish guidelines for the establishment and maintenance of the system in accordance with this section and the rules adopted under this section. The guidelines shall include:

- (1) Standards identifying and defining the types of data in the system in accordance with divisions (B) and (C) of this section;
- (2) Procedures for annually collecting and reporting the data to the state board in accordance with division (D) of this section;
- (3) Procedures for annually compiling the data in accordance with division (G) of this section;
- (4) Procedures for annually reporting the data to the public in accordance with division (H) of this section;
- (5) Standards to provide strict safeguards to protect the confidentiality of personally identifiable student data.

Common ORC Citations

ORC 3301.0714 Guidelines for statewide education management information system (continued)

- Requires the following data must be reported to ODE:
 - Average Student Grades in each subject
 - Academic achievement levels as assessed by the testing of student achievement
 - Number of students designated as having a disabling condition
 - Number of students reported to the state board
 - Attendance Rates and the average daily attendance for the year
 - Expulsion, Suspension, Graduation & Dropout rates
 - Rates of retention in grade

Common ORC Citations

ORC 3301.0714 Guidelines for statewide education management information system (continued)

- Items typically reviewed during testing
 - Sampling a selection of student data to include:
 - Proof of residency
 - Enrollment & Withdrawal dates
 - Birth Certificates
 - Enrollment Applications
 - Withdrawal Forms
 - Attendance Data

Common ORC Citations

ORC 149.41 School district records commission-educational service center records commission

- <https://codes.ohio.gov/ohio-revised-code/section-149.41>

There is hereby created in each city, local, joint vocational, and exempted village school district a school district records commission, and in each educational service center an educational service center records commission. Each records commission shall be composed of the president, the treasurer of the board of education or governing board of the educational service center, and the superintendent of schools in each such district or educational service center. The commission shall meet at least once every twelve months.

The function of the commission shall be to review applications for one-time disposal of obsolete records and schedules of records retention and disposition submitted by any employee of the school district or educational service center. The commission may dispose of records pursuant to the procedure outlined in section 149.381 of the Revised Code. The commission, at any time, may review any schedule it has previously approved and, for good cause shown, may revise that schedule under the procedure outlined in that section.

Common ORC Citations

- ORC 149.41 School district records commission-educational service center records commission (Continued)
 - Typically cited when records are not presented/available for audit evidence
 - Missing student data/ canceled checks/ invoices, etc.



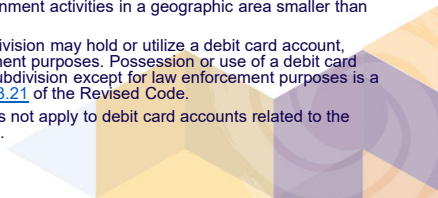
Common ORC Citations

- ORC 9.22 Use of debit card accounts
 - <https://codes.ohio.gov/ohio-revised-code/section-9.22>

As used in this section, "political subdivision" means a county, township, municipal corporation, or any other body corporate and politic that is responsible for government activities in a geographic area smaller than that of the state.

No political subdivision may hold or utilize a debit card account, except for law enforcement purposes. Possession or use of a debit card account by a political subdivision except for law enforcement purposes is a violation of section [2913.21](#) of the Revised Code.

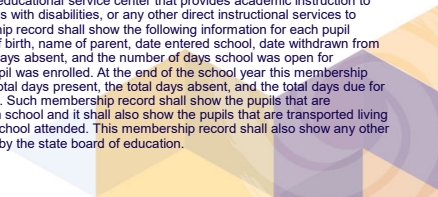
This section does not apply to debit card accounts related to the receipt of grant moneys.



Common ORC Citations

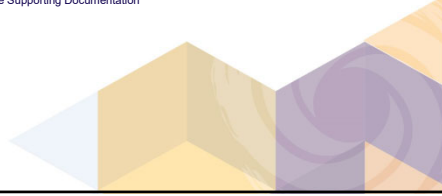
- ORC 3317.031 Membership record for each pupil – mandatory compliance
 - <https://codes.ohio.gov/ohio-revised-code/section-3317.031>

A membership record shall be kept by grade level in each city, local, exempted village, joint vocational, and cooperative education school district and such a record shall be kept by grade level in each educational service center that provides academic instruction to pupils, classes for pupils with disabilities, or any other direct instructional services to pupils. Such membership record shall show the following information for each pupil enrolled: Name, date of birth, name of parent, date entered school, date withdrawn from school, days present, days absent, and the number of days school was open for instruction while the pupil was enrolled. At the end of the school year this membership record shall show the total days present, the total days absent, and the total days due for all pupils in each grade. Such membership record shall show the pupils that are transported to and from school and it shall also show the pupils that are transported living within one mile of the school attended. This membership record shall also show any other information prescribed by the state board of education.



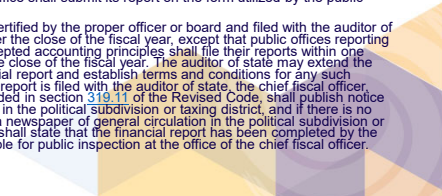
Common ORC Citations

- ORC 3317.031 Membership record for each pupil – mandatory compliance (continued)
 - Items typically reviewed during testing
 - Sampling a selection of student data to include:
 - Excused Absence Supporting Documentation



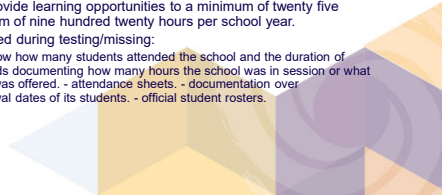
Common ORC Citations

- ORC 117.38 Annual Reports
 - <https://codes.ohio.gov/ohio-revised-code/section-117.38>
- (A) Each public office, other than a state agency, shall file a financial report for each fiscal year. The auditor of state may prescribe forms by rule or may issue guidelines, or both, for such reports. If the auditor of state has not prescribed a rule regarding the form for the report, the public office shall submit its report on the form utilized by the public office.
- (B) The report shall be certified by the proper officer or board and filed with the auditor of state within sixty days after the close of the fiscal year, except that public offices reporting pursuant to generally accepted accounting principles shall file their reports within one hundred fifty days after the close of the fiscal year. The auditor of state may extend the deadline for filing a financial report and establish terms and conditions for any such extension. At the time the report is filed with the auditor of state, the chief fiscal officer, except as otherwise provided in section 319.11 of the Revised Code, shall publish notice in a newspaper published in the political subdivision or taxing district, and if there is no such newspaper, then in a newspaper of general circulation in the political subdivision or taxing district. The notice shall state that the financial report has been completed by the public office and is available for public inspection at the office of the chief fiscal officer.



Common ORC Citations

- ORC 3314.03 Specifications of contract between sponsor and governing authority – specifications of comprehensive plan
 - <https://codes.ohio.gov/ohio-revised-code/section-3314.03>
 - states that the contract between a sponsor and the governing authority must specify that the school will provide learning opportunities to a minimum of twenty five students for a minimum of nine hundred twenty hours per school year.
 - Items typically reviewed during testing/missing:
 - - student files to show how many students attended the school and the duration of attendance. - records documenting how many hours the school was in session or what type of instruction was offered. - attendance sheets. - documentation over enrollment/withdrawal dates of its students. - official student rosters.



Common ORC Citations

- ORC 3314.074 Guidelines for statewide education management information system
 - <https://codes.ohio.gov/ohio-revised-code/section-3301.0714>
- states that School's must enter data concerning the enrollment and attendance of their students into EMIS, which is used by all schools to enter and review student enrollment and demographic data
 - Items typically reviewed during testing/missing:
 - board approved calendars plus calamity days not reconciling to calendar input into EMIS

Opportunities for Improvement

- Excused Absences
 - Excused absence policy requiring certain supporting documentation ex: doctors note, parent letter, phone call log
 - Common practice of school it not maintaining required documentation per board approved policy

Opportunities for Improvement

- Significant Deficiency: Internal Control over Financial Reporting

The AICPA establishes auditing standards generally accepted in the United States that certified public accountants and government auditors must follow in conducting audits of state and local governments. AU-C 265 establishes standards, responsibilities and guidance for auditors during a financial statement audit engagement for identifying and evaluating a client's internal control over financial reporting. This standard requires the audit to report in writing to management and the governing body any control deficiencies found during the audit that are considered significant deficiencies and/or material weaknesses. To this end, AU-C 265 lists specific control deficiencies that should be regarded as at least a significant deficiency and a strong indicator of a material weakness in internal control.

 - Condition: Audit adjustments were made to the financial statements presented for audit.

Opportunities for Improvement

2 CFR Part 200 Subpart F §200.510(b) and (b)(3) state: "The auditee must also prepare a schedule of expenditures of Federal awards for the period covered by the auditee's financial statements which must include the total Federal awards expended as determined in accordance with §200.502...At minimum, schedule must: Provide total Federal awards expended for each individual Federal program and the Assistance Listings Number or other identifying number when the Assistance Listings information is not available."

Link to sample federal schedule

- <https://ohioauditor.gov/references/practiceaids.html>

Opportunities for Improvement

Payroll Deficiencies

- Employment Contracts not all properly authorized by Director/Board President
- Gross payroll amounts not matching approved employment contracts
- Time cards not reconciling with gross wages and/or not approved by supervisor
- No supervisory review of payroll registers
- Personnel files not containing all appropriate documentation, W-4, OH-IT, etc.

Opportunities for Improvement

Non Payroll Deficiencies

- No documentation of approval of payment
- Fund/Function/Object allocations are reasonable
- Checks are not issued sequentially
- Not maintaining supporting documentation to substantiate credit card expenditures and/or credit card expenditures not for a proper public purpose

Compliance Hot Topics

- AOS Bulletin 2021-002 Community School Loans to Other Community Schools
 - <https://ohioauditor.gov/publications/bulletins/2021/2021-002.pdf>
 - For existing loans outstanding at the date of this Bulletin, the community school may either repay the loan in full immediately, or may continue to follow the currently established repayment plan. If an existing loan between community schools is not memorialized by the date of the release of this bulletin, the community schools party to the loan shall execute a loan agreement with reasonable terms in light of the facts surrounding said loan. Such an agreement must be executed within 60 days of the release of this bulletin. Failure to memorialize an existing loan agreement may result in a finding for recovery. Effective upon the date of this Bulletin, noncompliance and/or a Finding for Recovery may be issued as follows: • For existing loans outstanding at the date of this Bulletin where: o Loan payments are discontinued; o Loan agreement / covenants are not complied with; or o Repayment plan / loan document is altered. Auditors will continue to monitor repayments during each audit until repaid in full. • For any new loans made after the date of the issuance of this Bulletin.

Compliance Hot Topics

- OCS Section 2-23: AG Certified Public Records Training attendance documentation
 - We have recently been made aware that the Attorney General's Office (AGO) recently changed their procedure for providing proof of attendance at the required Sunshine Law trainings. In the past, the AGO had provided attendees with certificates as proof of attendance. Recently, the AGO began uploading to their external website an attendance roster for each training. The roster is now proof of attendance from the AGO to attendees. The attendance rosters are located here:
 - <https://www.ohioattorneygeneral.gov/Legal/Sunshine-Laws/Sunshine-Laws-Training-Attendance-Reports>

Operator AUP Issues

- Noted items in AUP
 - Support of Population (ledgers) to Sample not matching totals in the provided footnotes
 - Recording of expenses based on USAS Manual
 - USAS Manual
 - https://ohioauditor.gov/publications/uniform_school_accounting_system_user_manual.pdf
 - Sample Footnote
 - <https://ohioauditor.gov/references/guidance/communityschools/Management%20Company%20Footnote%20Presentation%20ORC%20314.024.xlsx>



Sample Footnote

Medicaid School Program (MSP)

- What is it?
- How the process works/Responsible parties
 - Interim Claiming – School/Billing agent
 - Cost Report – School/Billing agent
 - Engagement Letter (AUP Procedures) - CPA
 - Completion of engagement and submission of cost report
 - Deadline of December 31, 2021 (For year ended June 30, 2020)**

MSP - AUP

- Agreed Upon Procedure – Overview
 - Purpose of the procedures is to test the main items highlighted in the cost report that drive reimbursement
- Payroll
- Paid claims
- Fixed assets
- Statistics
- Procurement
- Non-payroll

MSP – Reimbursement

- Payroll**
 - Exhibit 7: Summary of MSP personnel
- Non-payroll**
 - Exhibit 8: Summary of contracted costs
- Total gross payroll/ benefits and contracted costs
- Including identified amounts paid with federal funds to be removed from reimbursable costs
- Amounts identified if participating in less than 3 RMTS quarters

MSP - Funding

- ❖ Paid Claims
 - Interim Medicaid claims received during the fiscal year
- ❖ Final Settlement
 - Submission/Review of Cost Report
- ❖ Documentation of required items within the plan of care
- ❖ Documentation of service delivery as maintained by billing agent
- ❖ Student attendance
- ❖ Parental consent

MSP – Common Findings (Paid Claims)

The Primary Finding:

- ❖ The eligible child's IEP shall contain the following components that, taken together and for the purposes of Chapter 5160-35 of the Administrative Code, are called the plan of care.

It should be:

- Signed by the qualified practitioner who recommends the service as a result of the assessment/evaluation, re-assessment/re-evaluation

Other Claim Related Findings

- ❖ Service identified on paid claim doesn't match service in IEP.
- ❖ Service date on paid claim was prior to the effective date of IEP.
- ❖ Billing units on paid claim don't match what was prescribed in the IEP.
- ❖ Student wasn't in attendance on claim date

MSP – Common Findings (Procurement/Non-Payroll)

- ❖ The contract file doesn't include documentation of the significant history of the procurement, including the rationale for the method of procurement (e.g., lowest bid), contractor(s) selected and those rejected, and the basis of contract price
- ❖ The procurements were not provided for full and open competition
 - Sole source contractor?
 - Shared Services?
 - Competition is limited?
- ❖ Contract files do not exist that shows a cost or price analysis was performed in connection with procurement actions, including contract modifications and that this analysis supports the procurement action

MSP – Common Findings (Procurement/Non-Payroll)

- Vendor contract excludes the following required federal language:
 - safeguarding and limiting access to information concerning beneficiaries
 - a clause that allows the representatives of the U.S. Department of Human Services, ODM, ODE or their respective designee access to the subcontractor's books, documents and records
 - an acknowledgement from the contracted party that they or their principals are not suspended or debarred
- No documentation showing the school obtained price and rate quotes
 - \$10,000 micro purchase limit
 - Non-competitive proposals
 - Shared service agreements
- Student listings are not available to support the invoice/amount charged to District.

MSP – Common Findings (Payroll)

- Supplemental contracts paid out of the General Fund being picked up in error
- Salary and benefits paid with federal funds inadvertently included
- Salary and benefits not being pro-rated based on the number of quarters employee participated in RMTS
- Support not provided by District to support portion of salary paid with federal funds
- Support provided difficult to reconcile to cost report

Questions?

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Cell: 330-231-2493
Email: zac.morris@reacpa.com

Morgan Helmick, CPA
Direct: 330-661-0234
Cell: 330-603-0738
Email: morgan.helmick@reacpa.com



The following is a sample of the management company footnote presentation format. See Ohio Compliance Supplement chapter 2-5 for a summary of requirements regarding this footnote.

	Regular Instruction (1100 Function codes)	Special Instruction (1200 Function codes)	Vocational Instruction (1300 Function codes)	Other Instruction (1400 and 1900 Function Codes)	Support Services (2000 Function Codes)	Non-Instructional (3000 through 7000 Function Codes)	Total
<i>Direct expenses:</i>							
Salaries & wages (100 object codes)	-	-	-	-	-	-	-
Employees' benefits (200 object codes)	-	-	-	-	-	-	-
Professional & technical services (410 object codes)	-	-	-	-	-	-	-
Property services (420 object codes)	-	-	-	-	-	-	-
Utilities (450 object codes)	-	-	-	-	-	-	-
Contracted craft or trade services (460 object codes)	-	-	-	-	-	-	-
Transportation (480 object codes)	-	-	-	-	-	-	-
Other purchased services (490 object codes)	-	-	-	-	-	-	-
Supplies (500 object codes)	-	-	-	-	-	-	-
Land (610 object code)	-	-	-	-	-	-	-
Buildings (620 object code)	-	-	-	-	-	-	-
Improvements other than buildings (630 object code)	-	-	-	-	-	-	-
Equipment (640, 644, and 645 object codes)	-	-	-	-	-	-	-
All other capital outlay (650 through 690 object codes)	-	-	-	-	-	-	-
Principal (810 object code)	-	-	-	-	-	-	-
Interest (820 object code)	-	-	-	-	-	-	-
Judgments (860 object code)	-	-	-	-	-	-	-
Other direct costs (All other object codes)	-	-	-	-	-	-	-
<i>Indirect expenses:</i>							
Overhead	-	-	-	-	-	-	-
Total expenses	-	-	-	-	-	-	-

Fraud Red Flags, Schemes & Proactive Prevention

Presented by:

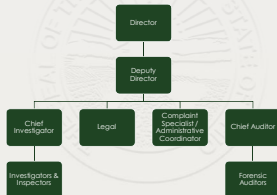
Max Uhl, CPA, AOS SIU Investigator
Darrin Batchelder, CFE, AOS SIU Forensic
Audit Manager

Session Objectives

- AOS Special Investigation Unit
- Fraud Indicators
- Common Fraud Schemes
- Strategies to be proactive in preventing fraud
- Investigations conducted by SIU

Special Investigations Unit (SIU)

Our mission is to promote transparency and accountability in the use of public funds, to expose fraud and corruption where it exists, and to assist law enforcement and prosecutors in the pursuit of justice.



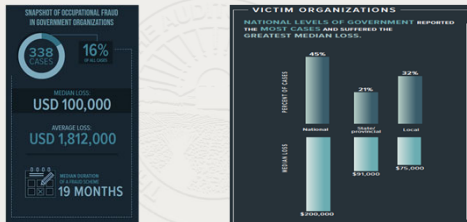
SIU Process



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4

Fraud's Impact on Government



Source: ACFE's Report to the Nations – 2020 Global Study on Occupational Fraud and Abuse – Government Edition

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5

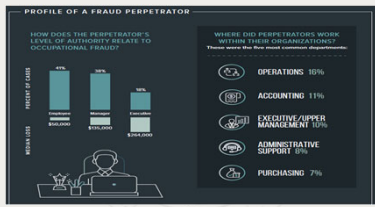
Financial Crimes

Who Commits Fraud?

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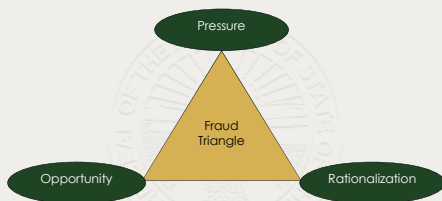
6

Profile of a Fraud Perpetrator

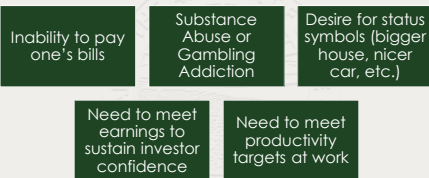


Source: ACFE's Report to the Nations – 2020 Global Study on Occupational Fraud and Abuse – Government Edition

Cressey's Fraud Triangle



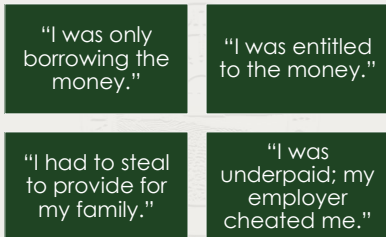
What are some of the pressures that may lead to fraud?



What are some of the opportunities that may lead to fraud?



Common Rationalizations



Warning Signs

- What warning signs or red flags should we all be on the lookout for in regards to employees or co-workers?



Warning Signs - General

- Weak Internal Controls!
- Unsupported transactions / journal entries / adjustments
- Unexpected overdrafts / declines in cash balances
- Photocopied or missing documents
- Excessive number of manual checks
- Does it make sense?
 - Business & common sense



Source: ACFE's Report to the Nations – 2020 Global Study on Occupational Fraud and Abuse – Government Edition

Warning Signs - Behavioral

- Annoyed by reasonable questions
- Provides unreasonable responses
- Bragging on purchases / lifestyle
- Refuse time-off / promotions
- Nonresponsive & delaying tactics
- Excessive borrowing from co-workers
- Carrying unusually large sums of money



Source: ACFE's Report to the Nations – 2020 Global Study on Occupational Fraud and Abuse – Government Edition

Fraud Schemes



Source: ACFE's Report to the Nations – 2020 Global Study on Occupational Fraud and Abuse – Government Edition

Generally Most High-Risk Areas

- Cash
 - Easiest to grab
 - Lack of controls
- Credit Cards
 - Easy to Use, easy to abuse
 - No review of monthly statement in place
 - No supporting documentation

Item and Item Version	Category	Amount	Description	Item Version	Amount	Description	Item Version	Amount
1 Monday, September 21, 2009	Accounting	387.79	Office supplies	1	387.79	Office supplies	1	387.79
2 Monday, September 21, 2009	Accounting	282.74	Office supplies	2	282.74	Office supplies	2	282.74
3 Monday, September 21, 2009	Accounting	387.79	Office supplies	3	387.79	Office supplies	3	387.79
4 Monday, September 21, 2009	Travel Agency	387.79	Travel Agency	4	387.79	Travel Agency	4	387.79
5 Monday, September 21, 2009	Travel Agency	387.79	Travel Agency	5	387.79	Travel Agency	5	387.79
6 Monday, September 21, 2009	Travel Agency	387.79	Travel Agency	6	387.79	Travel Agency	6	387.79
7 Tuesday, September 22, 2009	Travel Agency	387.79	Travel Agency	7	387.79	Travel Agency	7	387.79
8 Tuesday, September 22, 2009	Travel Agency	387.79	Travel Agency	8	387.79	Travel Agency	8	387.79
9 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	9	387.79	Travel Agency	9	387.79
10 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	10	387.79	Travel Agency	10	387.79
11 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	11	387.79	Travel Agency	11	387.79
12 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	12	387.79	Travel Agency	12	387.79
13 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	13	387.79	Travel Agency	13	387.79
14 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	14	387.79	Travel Agency	14	387.79
15 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	15	387.79	Travel Agency	15	387.79
16 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	16	387.79	Travel Agency	16	387.79
17 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	17	387.79	Travel Agency	17	387.79
18 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	18	387.79	Travel Agency	18	387.79
19 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	19	387.79	Travel Agency	19	387.79
20 Monday, September 28, 2009	Travel Agency	387.79	Travel Agency	20	387.79	Travel Agency	20	387.79
21 Tuesday, September 29, 2009	Travel Agency	387.79	Travel Agency	21	387.79	Travel Agency	21	387.79
22 Tuesday, September 29, 2009	Travel Agency	387.79	Travel Agency	22	387.79	Travel Agency	22	387.79
23 Tuesday, September 29, 2009	Travel Agency	387.79	Travel Agency	23	387.79	Travel Agency	23	387.79
24 Wednesday, September 30, 2009	Travel Agency	387.79	Travel Agency	24	387.79	Travel Agency	24	387.79
25 Wednesday, September 30, 2009	Travel Agency	387.79	Travel Agency	25	387.79	Travel Agency	25	387.79
26 Wednesday, September 30, 2009	Travel Agency	387.79	Travel Agency	26	387.79	Travel Agency	26	387.79
27 Wednesday, September 30, 2009	Travel Agency	387.79	Travel Agency	27	387.79	Travel Agency	27	387.79
28 Wednesday, September 30, 2009	Travel Agency	387.79	Travel Agency	28	387.79	Travel Agency	28	387.79
29 Thursday, October 1, 2009	Travel Agency	387.79	Travel Agency	29	387.79	Travel Agency	29	387.79
30 Thursday, October 1, 2009	Travel Agency	387.79	Travel Agency	30	387.79	Travel Agency	30	387.79
31 Thursday, October 1, 2009	Travel Agency	387.79	Travel Agency	31	387.79	Travel Agency	31	387.79
32 Thursday, October 1, 2009	Travel Agency	387.79	Travel Agency	32	387.79	Travel Agency	32	387.79
33 Thursday, October 1, 2009	Travel Agency	387.79	Travel Agency	33	387.79	Travel Agency	33	387.79
34 Thursday, October 1, 2009	Travel Agency	387.79	Travel Agency	34	387.79	Travel Agency	34	387.79
35 Friday, October 2, 2009	Travel Agency	387.79	Travel Agency	35	387.79	Travel Agency	35	387.79
36 Friday, October 2, 2009	Travel Agency	387.79	Travel Agency	36	387.79	Travel Agency	36	387.79
37 Friday, October 2, 2009	Travel Agency	387.79	Travel Agency	37	387.79	Travel Agency	37	387.79

Social Media

➤ Numerous Ways Social Media Can Be Used to Detect Fraud

- Location
- Time Frame
- Possible Related Parties
- Number of Individuals
- Income Lifestyle

➤ View Possible Perpetrator's Social Media but also:

- Relatives (especially children)
- Friends
- Possible Business Associates

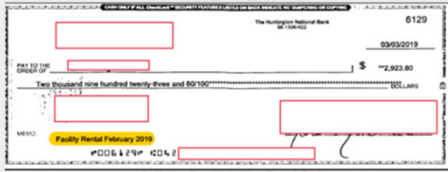
Expense Reimbursement Schemes

➤ Travel and expense budgets = common target for fraud.

➤ Generally, fall into four categories:

1. Mischaracterized expense reimbursements;
2. Overstated expense reimbursements;
3. Fictitious expense reimbursements;
4. Multiple reimbursements.

Check Substitution Scheme



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Check Substitution Scheme



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Payroll Schemes

➤ Employee fraudulently generates overcompensation on his/her behalf.

➤ **Most common payroll frauds:**

- Ghost employee schemes;
- Falsified hours and salary;
- Commission schemes.

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Register Disbursement Schemes

- Common at Schools
- In practice, employee removes cash from register, then
- Enters refund or voids sale to cover up theft.

Conflict of Interest

- ORC 2921.42
 - A conflict of interest transaction is not inherently illegal if four requirements are met:
 - Public contract is necessary supplies or services for the public entity;
 - Supplies or services are unobtainable elsewhere for the same or lower cost (or entity was obtaining supplies or services as part of a continuing course prior to public official becoming associated with the public entity);
 - Public entity did not provide preferential treatment to secure contract;
 - Entire transaction is at arm's length with full knowledge of all parties involved and public official takes no part in deliberations/decision of the public entity

Community School ABC

- School contracted with a janitorial company
 - Janitorial company was owned by Superintendent's husband and husband was also an employee of the school (Building Project Manager)
 - School business manual required school to bid out contracts over \$25,000
 - School bid out this contract and received a total of four bids
 - School selected Superintendent's husband's janitorial company which was the highest monthly bid

Reporting Fraud

- Auditor of State's Fraud Hotline
 - R.C. 117.103
 - H.B. 66 (2012)
- Contact Auditor of State
- Call Local Law Enforcement
- Records Retention:
 - Suspects may try to destroy or steal records, so it's up to us to protect evidence.

How to Report Fraud



Use our Mobile App*
[Find Out How](#)



Call the Special
Investigations Unit
1-866-Fraud-OH
1-866-372-8364



E-mail your Tip*
fraudohio@ohioauditor.gov



E-mail your Tip*
fraudohio@ohioauditor.gov

Convictions Involving Auditor of State Since 2019

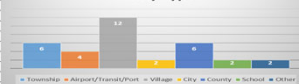
Convictions by Entity Type	Total
Airport/Transit/Port	4
City	6
County	11
School	7
Library	2
Parks/Recreation	3
Township	10
Village	20
Other	2
Total	65

Convictions by Entity Type



Total Theft in Office convictions by Entity Type	Total
Township	8
Airport/Transit/Port	4
Village	12
City	2
County	6
School	2
Other	3
Total	34

Theft in Office Convictions by Entity Type



Under Faber's administration (January 2019), the Auditor of State's office has been involved in convicting 65 government officials of fraud or wrongdoing resulting in over \$5.7 million of restitution ordered to be paid back to public entities.

Contact Information

Special Investigations Unit
88 East Broad Street
Columbus, Ohio 43215
E-mail: JMuhl@ohioauditor.gov
DSBatchelder@ohioauditor.gov

www.FraudOhio.com
Fraud Hotline: 1-866-FRAUD-OH
(614) 466-3786

88 E. Broad St.
Columbus, Ohio 43215
Phone: 800-282-0370

OhioAuditor.gov
