



ERIE COUNTY COMPTROLLER
HON. STEFAN I. MYCHAJLIW

November 5, 2020

Colleen Heidinger
President
43 North
1 West Seneca Street, Floor 24
Buffalo, NY 14203

Dear President Heidinger:

On October 13, 2020, the County Executive announced \$20,000,000 in funding for businesses to assist with recovery from the business downturn that was a result of steps taken to combat COVID-19. The County is to work in partnership with 43 North to administer this Back to Business Grant program.

Of course, this is a significant amount of money that will hopefully enable local small businesses devastated by COVID-19 social distancing mandates to begin to recover. Given the amount of this money, as well as the requirements that accompany this money provided by the federal CARES Act, it should be anticipated that an audit performed by either the Erie County Comptroller's Office or the federal government could occur.

Because of the increased likelihood of an audit, we are requesting and advising you to preserve and maintain the following, but not limited to, records kept in the process of awarding and distributing grants to local businesses:

- Policies and procedures used to administer, evaluate and select grant recipients;
- Selection criteria and/or scoring rubrics for all applicants for the grants;
- Amounts distributed to grant recipients and documentation as to how the money was spent;
- Documentation as to any administrative costs incurred and spent from the CARES Act money; and
- Documentation as to any amounts spent that were not distributed to businesses, including, but not

limited to advertising costs

Of course, if the program is expanded to include money that may be distributed separately from CARES Act funds, please similarly maintain those records as well.

Carefully maintaining such records, in addition to being recommended business practice, will assist in making any future audit more efficient and transparent. Given this large allocation of tax dollars, this office and the public at large will appreciate your efforts. Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Stefan I. Mychajliw, Jr.
Erie County Comptroller

cc: Robert W. Keating, Erie County Budget Director