NATIONAL ASSOCIATION of COUNTIES NACo

ARPA FISCAL RECOVERY FUND

PART 2: NAVIGATING THE PROJECT & EXPENDITURE REPORTING PORTAL

APRIL 26, 2022

REPORTING AND COMPLIANCE REQUIREMENTS

- QUARTERLY **PROJECT AND EXPENDITURE REPORTS:** The following recipients are required to submit a quarterly Project and Expenditure Report to Treasury **by April 30, 2022:**
  - Recipients with populations that **exceed 250,000 residents** (referred to as a Tier 1 recipient)
  - Recipients with a population **below 250,000 residents yet received more than $10 million** in Recovery Funds (referred to as a Tier 2 recipient)
- ANNUAL **PROJECT AND EXPENDITURE REPORTS:** The following recipients are required to submit an annual Project and Expenditure Report to Treasury **by April 30, 2022:**
  - Recipients with **populations below 250,000 residents and received less than $10 million** in Recovery Funds only need to submit this report annually after the first reporting deadline in April, 2022
- RECOVERY PERFORMANCE PLAN: **All recipients with a population that exceeds 250,000 residents** are also required to publish and submit an **annual** Recovery Plan performance report throughout the entire period of performance

SINGLE AUDIT ALTERNATIVE

1. If you are eligible, you should discuss this with your Auditor
2. This is an addendum to the 2021 Single Audit (SA) Compliance Supplement and the revision is Addendum 3
3. Addendum 3 includes a simplified Single Audit process (an "Attestation") for direct recipients that are considered exempt from the Single Audit if it was not for the expenditures of SLFRF funds
4. This alternative is intended to reduce the burden of a full Single Audit or Program-Specific Audit on eligible recipients and practitioners
5. This alternative applies to fiscal year audits beginning after June 30, 2020
6. Attestation would result in an auditor's opinion on compliance which includes an assessment of two activities, specifically "activities allowed" and "unallowed/allowable cost"
7. Attestation is optional
8. Eligibility is limited:
    - Attestation (instead of SA) eligibility would only apply to direct recipients either from Treasury or from the States (NEUs) receiving under $10M in total
    - Attestation (instead of SA) eligibility would apply to direct recipients only if other Federal award funds the recipient expended are less than $750,000 during the recipient's fiscal year – not including their SLFRF award funds
9. Single Audit would still apply if the recipient spends over $750K in **ANY OTHER** federal funds
10. UG still applies to ALL expended funds, whether the recipient performs an Attestation or a SA
11. UG requires non-Federal entities that expend $750,000 or more a year in Federal awards to have an audit conducted in accordance with the Uniform

REVENUE REPLACEMENT

- Recipients have the option to update or provide new information associated with revenue replacement
- Previous information (if provided) as part of the Interim Report or P&E Report (if provided) will display on the screen
- Recipient will have the option to make a one-time decision toe ither calculate revenue loss with the Treasury formula OR election the $10 million standard allowance, not to exceed the award allocation
- **Recipients must make this one-time decision during the April 2022 reporting deadline – There are not exceptions to this requirement**

RECIPIENTS ARE REQUIRED TO MAKE A ONE-TIME DECISION FOR REVENUE REPLACEMENT IN THE APRIL 2022 P&E REPORT

KEY CONCEPTS OF P&E REPORT

1. **Expenditure Categories:** 83 different expenditure categories to choose from included in Treasury's reporting and compliance document

2. **Projects:** Include new or existing services, funded in whole or in past by Recovery Funds
   - Must align with ONE expenditure category
   - Recipient is required to track obligations and expenditures, and subrecipients and subawards

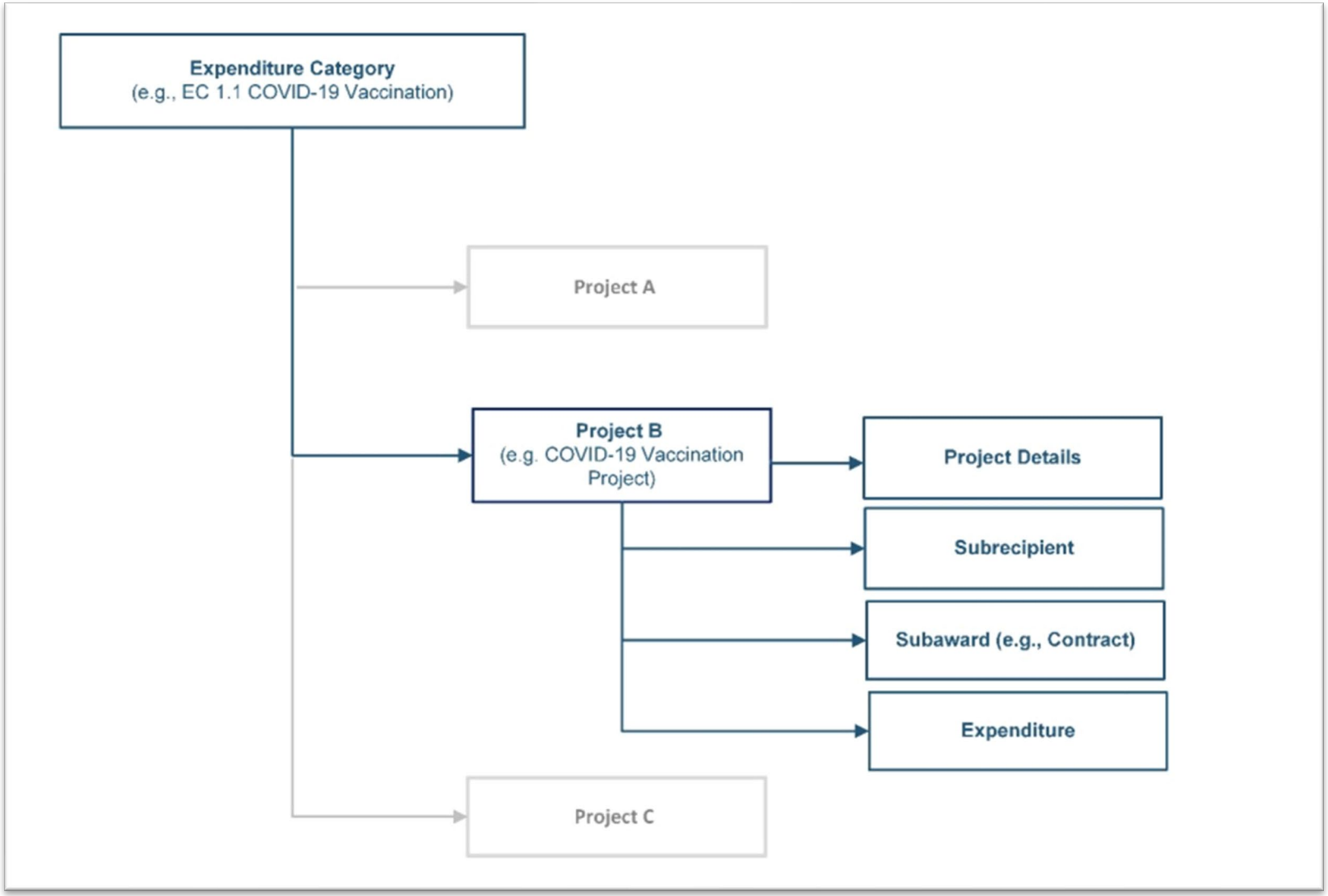
3. **Relationships between project components:**
   - Specifying the Expenditure Category (EC)
   - Enter subrecipient/beneficiary/contractor information (UEI, TIN or DUNSs)
   - Subaward or direct payment information
   - Expenditures:
     - Greater than $50,000
     - Aggregate expenditures less than $50,000
     - Payments to individuals

STRUCTURE OF P&E REPORT

1. **Introduction/bulk templates**
2. **Recipient profile**
3. **Project overview**
   - Name, ID number, adopted budget, total obligations/expenditures, status of project and project description
4. **Subrecipients/beneficiaries/contractors**
   - A subrecipient must be created before entering subaward information
   - For payments greater than $50,000
5. **Subawards/direct payments**
   - Identify project and subrecipient associated with subaward
   - Subaward type
   - Amount, period of performance, location of performance, description
6. **Expenditures**
7. **Recipient specific**

REMINDER: GOVERNMENT SERVICES (EC 6.1) – RECIPIENTS DO NOT HAVE TO ENTER IN SUBRECIPIENT OR SUBAWARD INFORMATION

STRUCTURE OF THE P&E REPORT



P&E REPORT: FREQUENTLY ASKED QUESTIONS

- **What are the definitions of a subrecipient, subaward, beneficiary and contractor?**
  - **Subaward:** An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity.
  - **Subrecipient:** An entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a Federal award.
  - **Beneficiary:** An entity or individual who receives funds for the purpose of directly benefitting them as a result of experiencing a public health impact or negative economic impact of the pandemic.
  - **Contract:** A legal instrument by which a recipient or subrecipient purchases property or services needed to carry out the project or program under a Federal award.

P&E REPORT: FREQUENTLY ASKED QUESTIONS

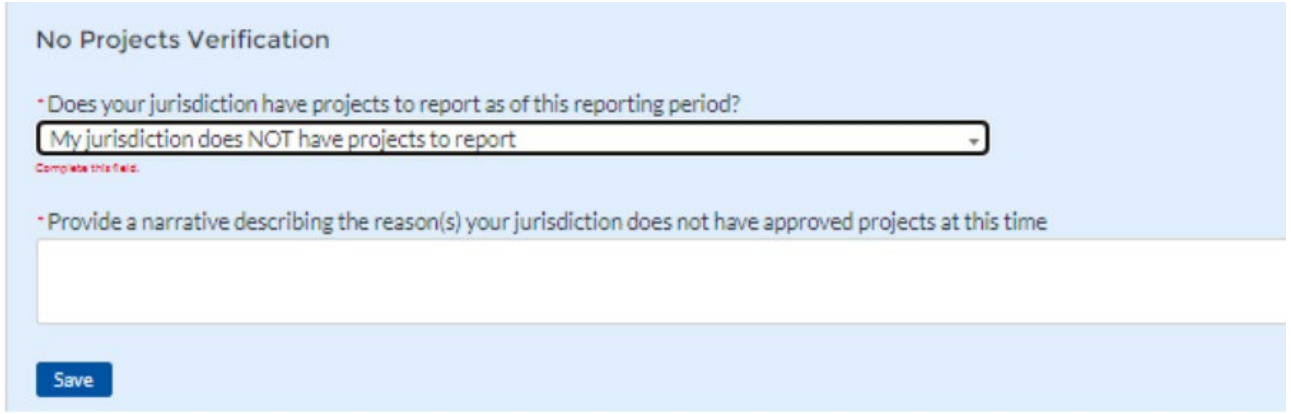
- **When I complete and try to submit my P&E Report, it says I am not the Authorized Representative. What do I do?**
  - Review Treasury's video of assigning user roles: https://youtu.be/w7vbi94rVDIIf
  - If the issue persists, send an email to SLFRP@treasury.gov and COVIDReliefITsupport@treasury.gov

P&E REPORT: FREQUENTLY ASKED QUESTIONS

- **If my county did not have any revenue loss, are we still allowed to claim the $10 million revenue loss standard allowance?**
  - **Yes.** The Final Rule offers a standard allowance for revenue loss of up to $10 million, allowing counties to select between a standard amount of revenue loss or complete a full revenue loss calculation. Counties that select the standard allowance may use that amount – in many cases their full award – for government services, with streamlined reporting requirements.

P&E REPORT: FREQUENTLY ASKED QUESTIONS

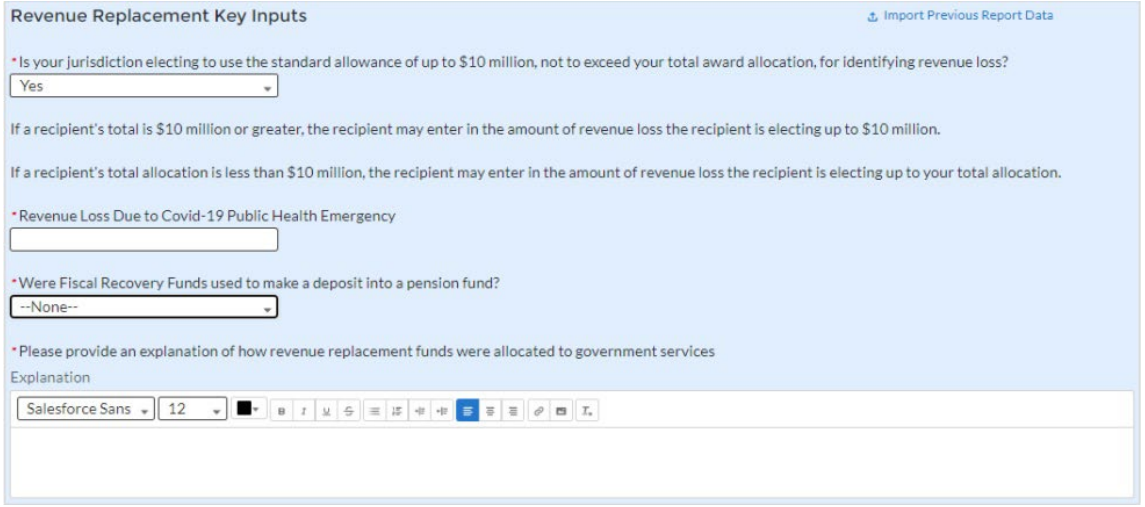
- **If my county has not yet identified any project to report, how do we complete the P&E Report?**
  - In the event that your county does not have any to report, an option has been included on the Project Overview screen to allow recipients to indicate this status to Treasury in lieu of adding project.
  - If you select this option, you will be required to provide a written explanation. This option will not appear if projects are already entered in the system.



1. *For the question "Does your jurisdiction have projects to report as of this reporting period?", select "My jurisdiction has projects to report" or "My jurisdiction does NOT have projects to report".*
2. *If no projects will be reported, provide a narrative describing the reason(s) your jurisdiction does not have approved projects at this time.*

P&E REPORT: FREQUENTLY ASKED QUESTIONS

- **If my county is claiming the $10 million revenue loss standard allowance, do we enter our entire ARPA Recovery Fund allocation (both first and second tranches) in the P&E Report?**
  - When claiming the $10 million revenue loss standard allowance, your county will enter in its entire ARPA Recovery Fund allocation (the total of both the first and second tranches), not to exceed your total award allocation.



1. *If a county's total allocation is $10 million or greater, the county may enter in the amount of revenue loss the recipient is electing up to $10 million.*

2. *If a county's total allocation is less than $10 million, the county may enter in the amount of revenue loss the recipient is electing up to your total allocation.*

P&E REPORT: FREQUENTLY ASKED QUESTIONS

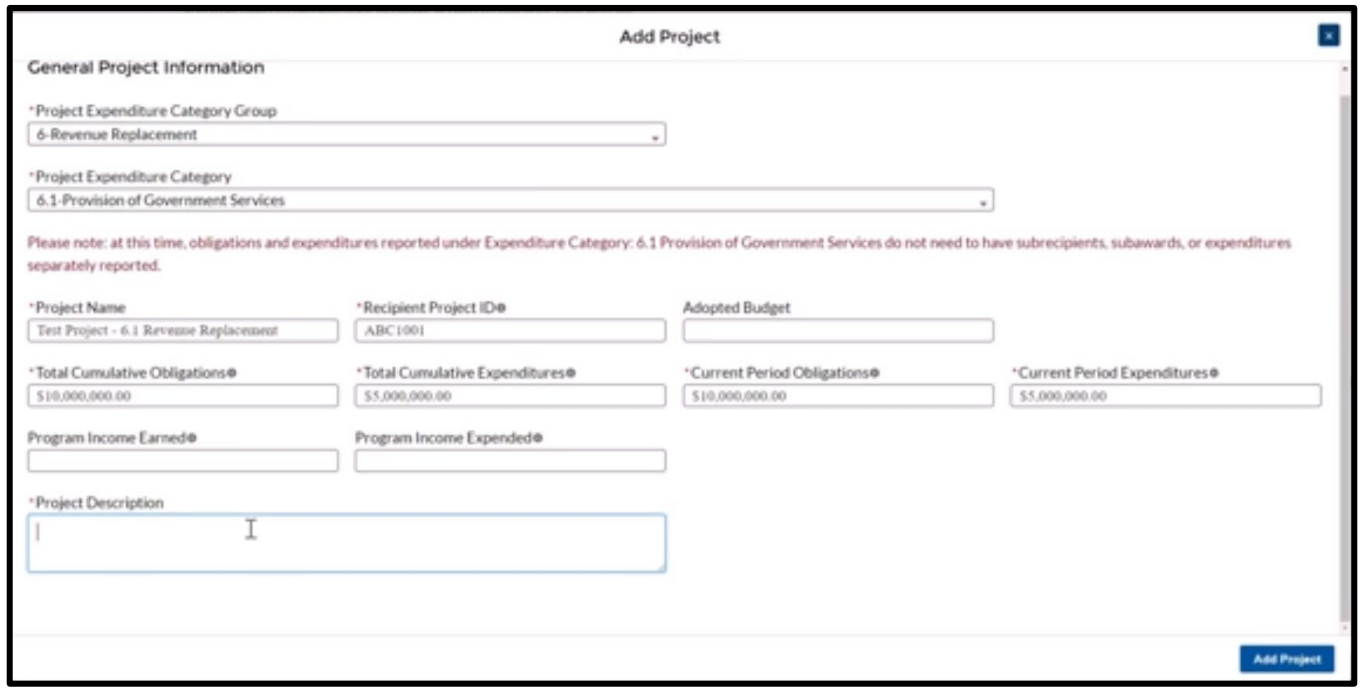
- **If my county had already obligated or expended funds for a project under another eligible category before the $10 million standard allowance was announced by Treasury, are we able to recategorize in the April P&E Report?**

  - Yes. For example, a county with a $9 million allocation may have obligated or expended funds for a project under another eligible use category (e.g., COVID-19 Vaccination) before the $10 million standard allowance was announced by Treasury. In that case, the county could report the project under the COVID-19 Vaccination eligible use category, and then choose to attribute the rest of its allocation to the revenue loss standard allowance.

  - **Alternatively, this recipient could recategorize its previously obligated funds under the revenue loss eligible use category (EC 6.1 – Government Services) to account for them all under revenue loss.**

P&E REPORT: FREQUENTLY ASKED QUESTIONS

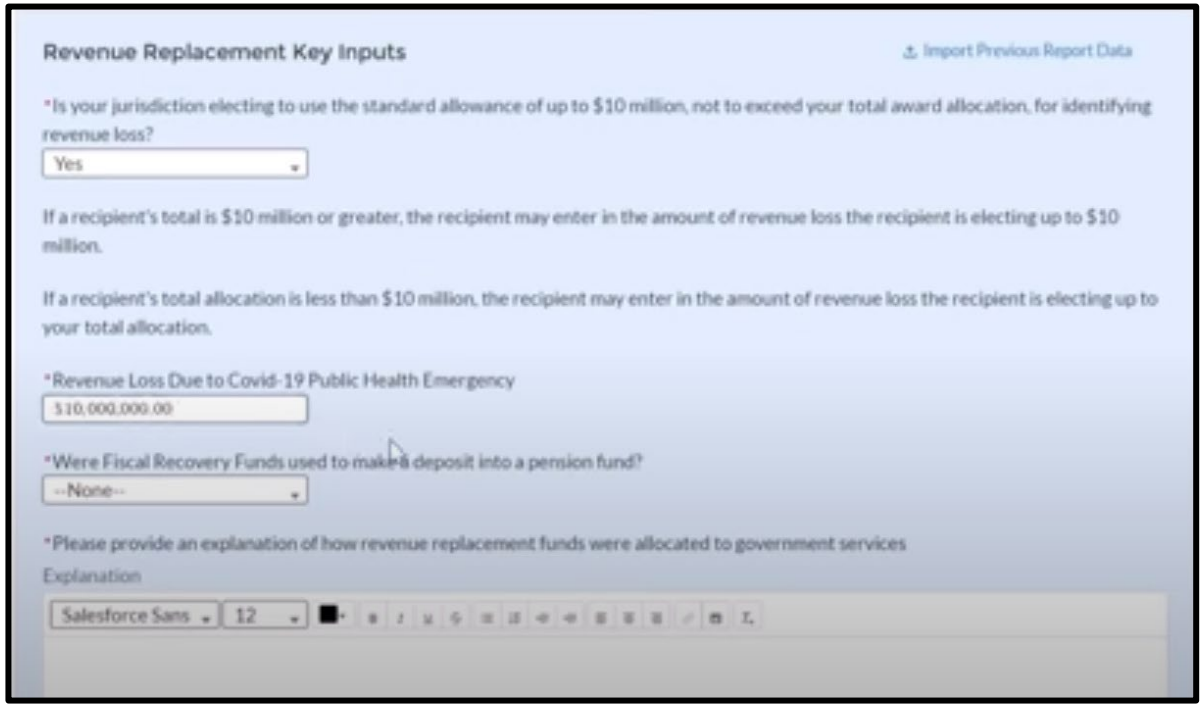
- **If I am claiming the $10 million revenue loss standard allowance and am only charging projects to EC 6.1 – Government Services – how do I complete my P&E Report?**
  1. Go to the "Project Overview" section
  2. Choose 6 – *Revenue Replacement* – under the "Project Expenditure Category Group"
  3. Choose EC 6.1 – Provision of Government Services – under the "Project Expenditure Category"
  4. Enter in Project Name
  5. Enter Recipient Project ID#
  6. Enter Total Cumulative Obligations
  7. Enter Total Cumulative Expenditures
  8. Enter Program Description



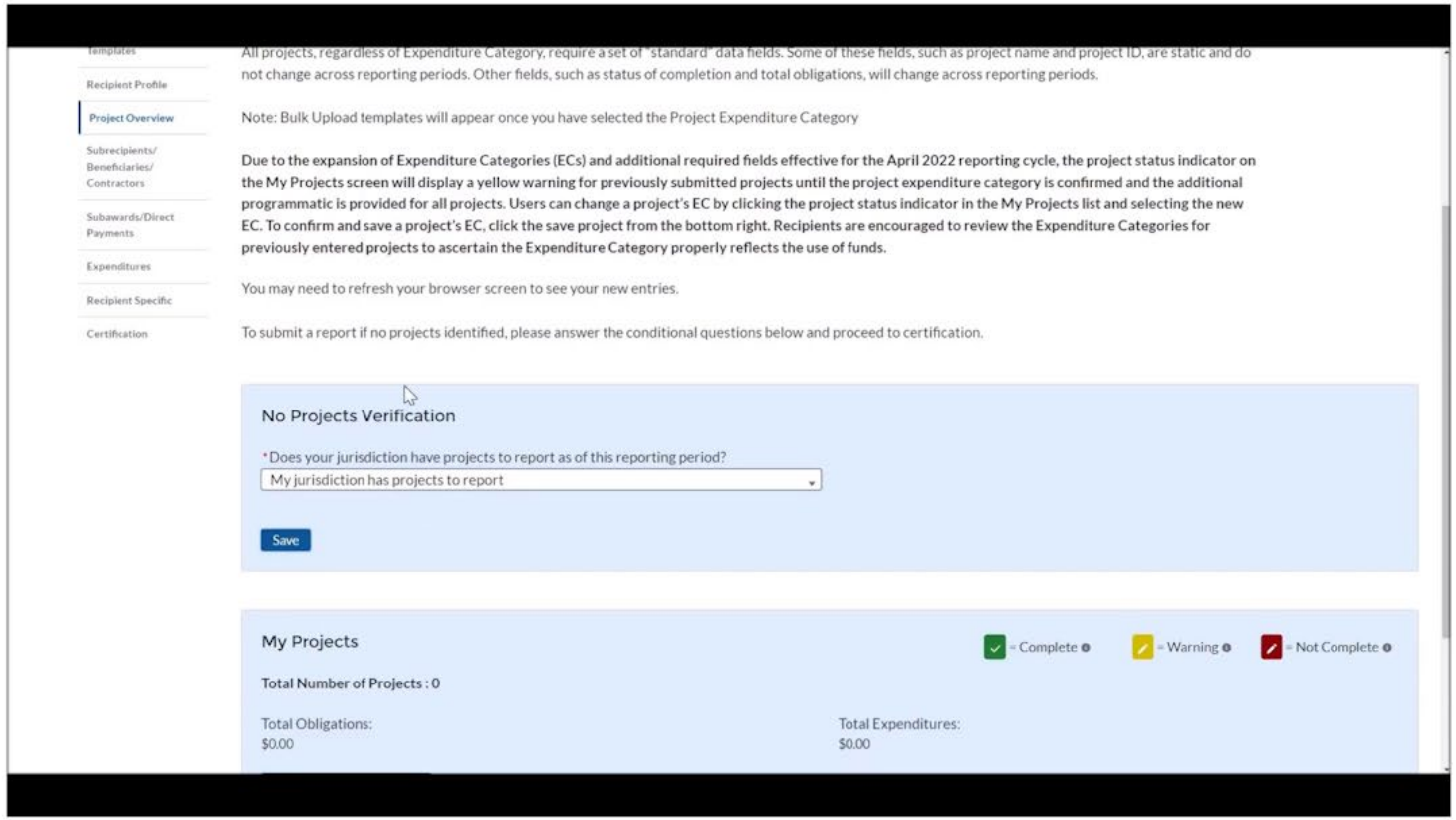
P&E REPORT: FREQUENTLY ASKED QUESTIONS

- **If I am claiming the $10 million revenue loss standard allowance and am only charging projects to EC 6.1 – Government Services – how do I complete my P&E Report?**

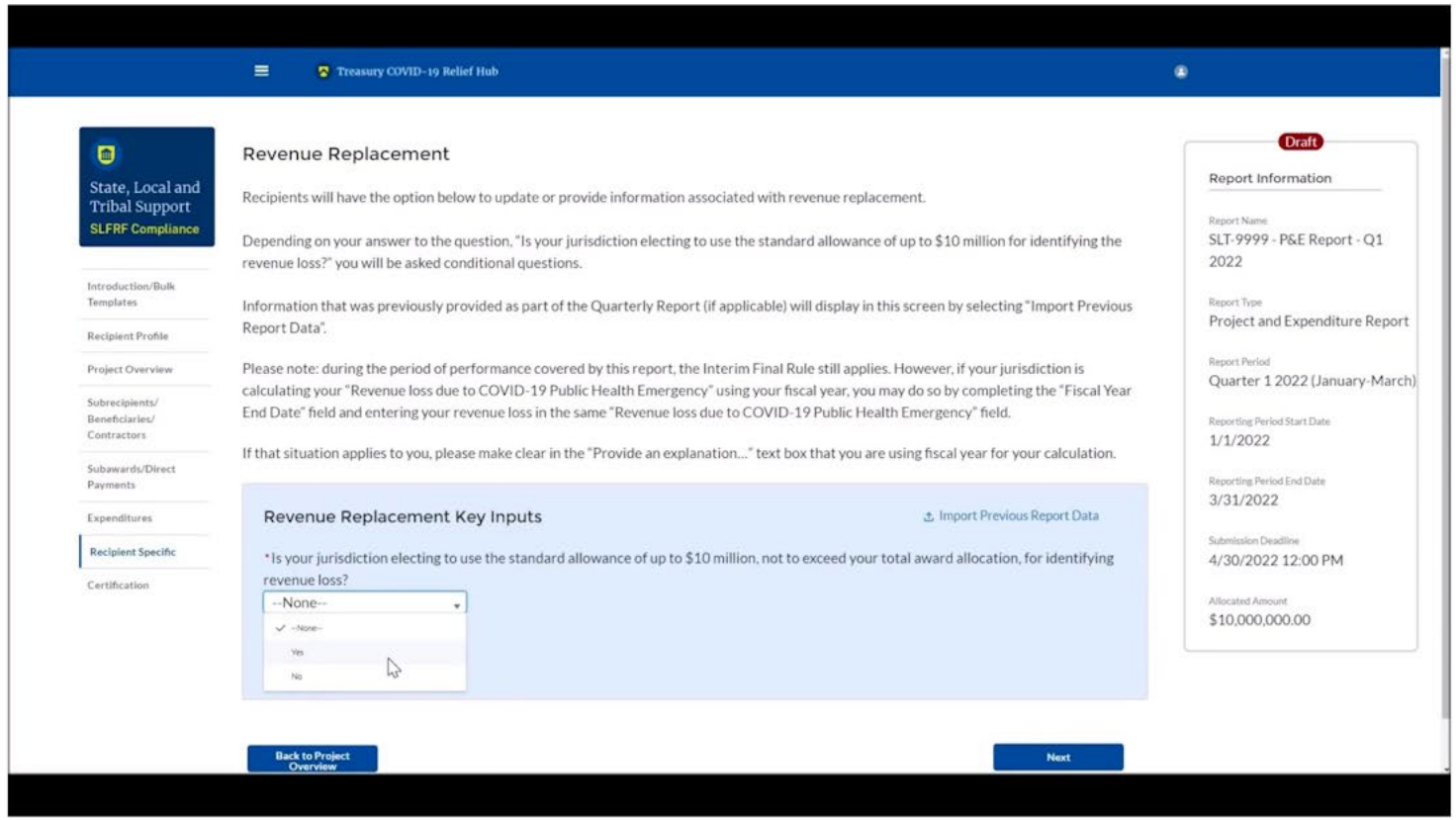
9. SKIP the following modules:
    - Subrecipients/beneficiaries/contractors
    - Subawards/direct payments
    - Expenditures
10. Go to the *"Recipient Specific"* module
11. Choose "Yes" under *"Is your jurisdiction electing to use the standard allowance of up to $10 million, not to exceed your total allocation, for identifying revenue loss?"*
12. Enter in the amount you would like to claim in the field below *"Revenue Loss Due to COVID-19 Public Health Emergency"*
13. Provide a description of how revenue replacement funds were allocated to government services



TREASURY DEMONSTRATION FOR P&E REPORT



TREASURY DEMONSTRATION FOR P&E REPORT



P&E REPORT: FREQUENTLY ASKED QUESTIONS

TREASURY'S FAQs FOR RECIPIENTS

- **I have a number of questions about the reporting process, where is the best resource for general information about reporting?**
  - Recipients should visit Treasury's reporting homepage for extensive information on the reporting process including a user guide with step-by-step instructions, how to videos, and other resources to answer commonly asked questions.

- **I can fill out the report but when I go to submit it says I am not the Authorized Representative and cannot submit.**
  - Treasury has updated roles for all NEUs at this time and recipients having this issue should try again to submit their report. If they need to change roles themselves, users can watch the video here: https://youtu.be/w7vbi94rVDIIf. If they continue to have issues, they should reach out to our helpdesk.

- **After logging in error message appears that says "No matching contact record was found. Please contact your Account Administrator to create a Contact Record for you in the system…."**
  - This means Treasury does not currently have this person's email address listed as a contact person for a particular recipient. They should e-mail Treasury at SLFRF@treasury.gov or call our call center at 844-529-9527.

- **Question: I sent an email requesting help but I have not heard back yet.**
  - Treasury has received a large number of messages from recipients and some recipients are experiencing a delay in receiving a response. Our helpdesk staff is working as fast as possible to respond to all messages in the order they were received. Recipients should avoid sending multiple emails to the inbox with the same question as this will further delay responses for recipients as helpdesk staff take the time to review duplicate inquiries.

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