

**Vocabulary of the American Rescue Plan Act**

**General Revenue** includes revenue from taxes, current charges, and miscellaneous general revenue. It excludes refunds and other correcting transactions, proceeds from issuance of debt or the sale of investments, agency or private trust transactions, and revenue generated by utilities and insurance trusts. General revenue also includes intergovernmental transfers between state and local governments, but excludes intergovernmental transfers from the Federal government, including Federal transfers made via a state to a locality pursuant to the CRF or the Fiscal Recovery Funds.

**Needing Assistance with Your Program**

Contact the Crawford County Planning Office if you have questions about the American Rescue Plan Act.

Crawford County Planning open Monday thru Friday 8:30 to 4:30

General Office Email - [Planning@co.crawford.pa.us](mailto:Planning@co.crawford.pa.us)

Zach Norwood, Director – [znorwood@co.crawford.pa.us](mailto:znorwood@co.crawford.pa.us)

Jenny Tompkins, Assistant Director, Community Development – [jtompkins@co.crawford.pa.us](mailto:jtompkins@co.crawford.pa.us)

Main office number - 814.333.7341

Reminder that Crawford County Planning will have a staff member dedicated to the American Rescue Plan. Should your community need assistance or want the County to administer the municipalities program on your behalf, please contact us or the office so we can discuss this opportunity.

**Online Resources**

**Crawford County Planning Webpage** - [www.crawfordcountypa.net/Planning](http://www.crawfordcountypa.net/Planning)

**U.S. Treasury Webpage** - <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/state-and-local-fiscal-recovery-funds>

**DUNS Number Application** - <https://fedgov.dnb.com/webform/displayHomePage.do>

# American Rescue Plan Act

Interim Guidance Resource  
Crawford County Planning



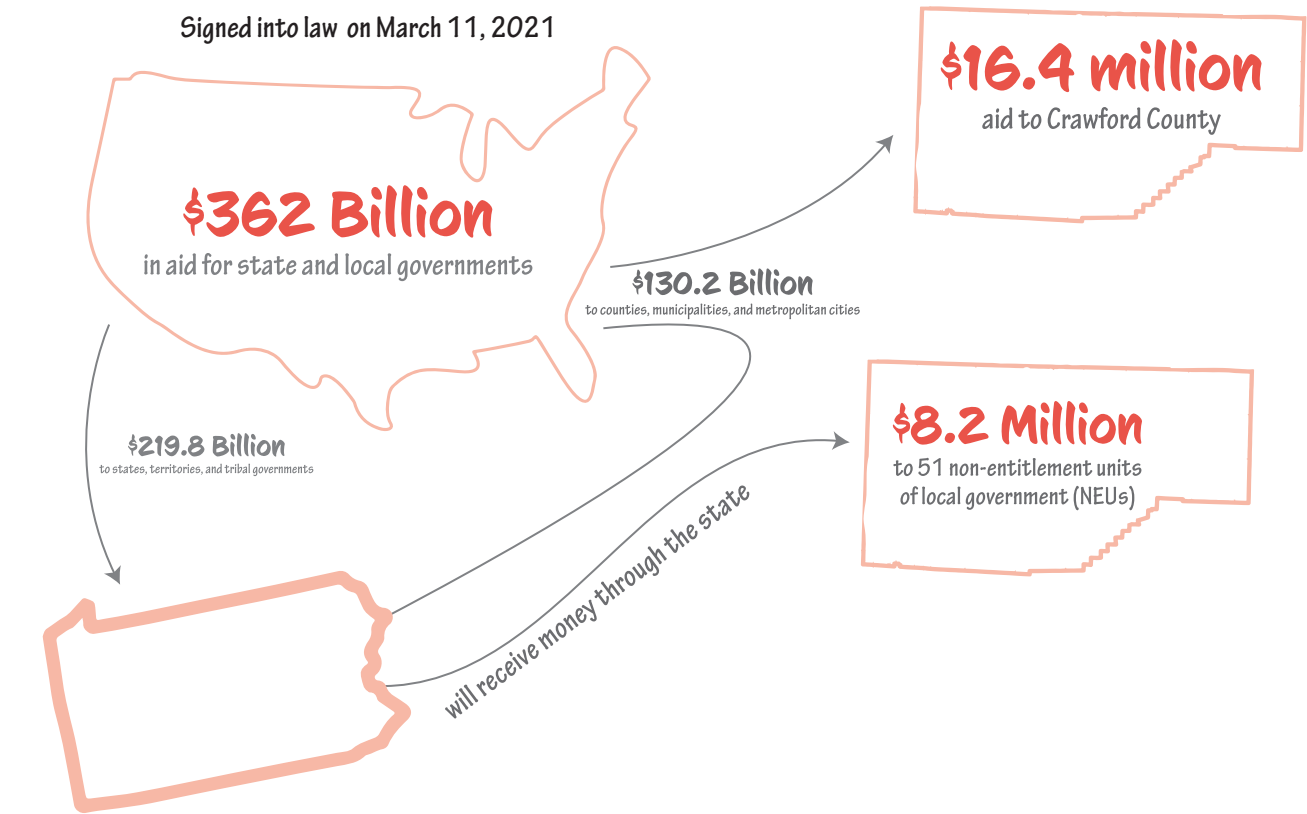
## Municipal Informational Meetings

May 25, 2021 - Crawford County Public Safety Building 6:30 PM

May 26, 2021 - Conneaut Lake Municipal Building 6:30 PM

June 1, 2021 - Towne Square 2nd Floor Conference Room 5:30 PM





Money will be distributed in 2 payments  
Summer 2021 + 12 months later

Pennsylvania has **90 Days** from March 11, 2021 to get money out to communities

Pennsylvania May seek a **30 Day Extension**

Must have a DUNS Number  
See the back page to apply for a DUNS number.

Funds must be obligated by **December 31, 2024**

Municipal Award cannot exceed **75%** most recent total annual operating budget as of January 27, 2020

Must keep all records at least **Five years** after all funds are expended or returned to the Treasury

Funds must be spent by **December 31, 2026**

6. Can recipients use funds for administrative purposes?  
Recipients may use funds to cover the portion of payroll and benefits of employees corresponding to time spent on administrative work necessary due to the COVID-19 public health emergency and its negative economic impacts. This includes, but is not limited to, costs related to disbursing payments of Fiscal Recovery Funds and managing new grant programs established using Fiscal Recovery Funds.

7. Can local governments transfer money to other entities? Which entity assumes the responsibility for compliance with the ARPA regulations?  
The ARPA authorizes State, territorial, and Tribal governments; counties; metropolitan cities; and non-entitlement units of local government (counties, metropolitan cities, and non-entitlement units of local government are collectively referred to as “local governments”) to transfer amounts paid from the Fiscal Recovery Funds to a number of specified entities. Specifically, a State, territory, or Tribal government may transfer funds to a “private nonprofit organization . . . a Tribal organization . . . a public benefit corporation involved in the transportation of passengers or cargo, or a special-purpose unit of State or local government, including for fire, water, or sewer services.” The only eligible non-profit recipients are those with a 501(c)(3) designation. Similarly, the Act authorizes a local government to transfer funds to the same entities (other than Tribal organizations).

A transferee receiving a transfer from a recipient will be a subrecipient. Subrecipients are entities that receive a subaward from a recipient to carry out a program or project on behalf of the recipient with the recipient’s Federal award funding. The recipient remains responsible for monitoring and overseeing the subrecipient’s use of Fiscal Recovery Funds and other activities related to the award to ensure that the subrecipient complies with the statutory and regulatory requirements and the terms and conditions of the award. Recipients also remain responsible for reporting to Treasury on their subrecipients’ use of payments from the Fiscal Recovery Funds for the duration of the award.

8. How is Crawford County going to spend its American Rescue Plan Act allocation?  
The Crawford County Board of Commissioners has not yet determined the use of its ARPA allocation. The County will solicit community feedback regarding the use of funds and unmet needs to mitigate the pandemic. The Commissioners encourage all municipalities in the county to undergo a process that incorporates community feedback as well.

To administer ARPA funds, the County will be hiring an American Rescue Plan Act Project Manager for the duration of the grant period. They will also be available to assist municipalities with a range of responsibilities related to ARPA from day-to-day questions to full, contracted oversight. This staff person will be working in the Crawford County Planning Office.

9. Will the County be holding additional informational sessions for municipalities related to the American Rescue Plan Act?  
The County will continue to provide resources to its municipalities as the U.S. Treasury clarifies key points, makes changes to the eligible use of funds, and issues new guidance. At this time, there are no additional municipal informational sessions scheduled, but municipalities are encouraged to make the County Planning Office aware if they have not received prior emails related to the American Rescue Plan Act. The County may offer additional sessions throughout the performance period.

1. What are common acronyms that I should be aware of regarding discussions around the American Rescue Plan Act?
  - ARPA = American Rescue Plan Act (Biden Administration relief package passed to mitigate the impacts of the pandemic)
  - CSFRF = Coronavirus State Fiscal Recovery Fund
  - CLFRF = Coronavirus Local Fiscal Recovery Fund
  - CRF = Coronavirus Relief Fund (Fund created to support state and local governments created out of the Trump Administration's relief package, the CARES Act)
  - NEU = Non-Entitlement Unit of Local Government (governmental jurisdictions with populations under 50,000)
  - QCT = Qualified Census Tract (a low-income area as designated by the U.S. Department of Housing and Urban Development)
  
2. What is the definition of "budget" for the purpose of the 75 percent cap on NEU payments, and who is responsible for enforcing this cap?
 

States are responsible for enforcing the "75 percent cap" on NEU payments, which is a statutory requirement that distributions to NEUs not exceed 75 percent of the NEU's most recent budget. Treasury interprets the most recent budget as the NEU's most recent annual total operating budget, including its general fund and other funds, as of January 27, 2020. States may rely for this determination on a certified top-line budget total from the NEU. Funding amounts in excess of such cap must be returned to Treasury.
  
3. Will my municipality be required to apply to the U.S. Treasury for our ARPA allocation?
 

No, local municipalities will receive their allocations through the State of Pennsylvania. The Commonwealth has not identified how municipalities will apply to receive the allocation.
  
4. What happens if my municipality does not accept the ARPA allocation available to us?
 

Under federal guidance if a NEU declines its funding allocation, that allocation is transferred to the State. The U.S. Treasury will consider this a cancellation of the local government award and a modification of the award to the Commonwealth. This means that money which could go to help citizens in Crawford County would go to Harrisburg and spent in other communities.
  
5. What federal environmental, fair labor, and fair housing, equal opportunity legislation applies to the use of ARPA funds?
 

Per the Award Terms and Conditions for Non-entitlement Units of Local Government, the use of ARPA funds is applicable to the following federal regulations and statutes:

• Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR Part 200	• OMB Guidelines to Agencies on Governmentwide Debarment and Suspension, 2 CFR Part 180
• Universal Identifier and System for Award Management (SAM), 2 CFR Part 25	• Recipient Integrity and Performance Matters, 2 CFR Part 200, Appendix XII
• Reporting Subaward and Executive Compensation Information, 2 CFR Part 170	• New Restrictions on Lobbying, 32 CFR Part 21
	• Uniform Relocation Assistance and Real Property Acquisitions Act of 1970 and implementing regulations

Generally applicable federal environmental laws and regulations, but not subject to NEPA environmental review requirements per published ARPA FAQ.

**CRAWFORD COUNTY PLANNING RECOMMENDS EVERY COMMUNITY DOES THE FOLLOWING:**

1. Review the NEU Checklist for Requesting Initial Payment from U.S. Department of Treasury (provided as part of the packet)
2. Apply for a DUNS Number if needed
3. Confirm your municipal total annual operating budget as of January 27, 2020. Use this figure to determine if allocation exceeds 75% of this total.
4. Review award terms and conditions agreement and assurances of compliance, prepare to sign, and keep on-file for first reporting due October 31, 2021
5. Prepare to register for Sam.gov registration shortly after receiving first payment from state
6. Develop a plan for the use of the ARPA aid. Consider your staff capacity to administer a Program of this scale. What other resources or assistance might you need to tap to effectively utilize funds?
7. Seek public comment on your communities plan for the use of the ARPA aid. This is required and will be monitored at closeout.
8. Calculate three-year growth rate, real lost revenue for 2020, and projected lost revenue through 2024 to understand funding that may be available for general government use
9. Monitor other funding streams that may overlap with goals, including other programs created under the American Rescue Plan Act

**COMMUNITIES SHOULD CONSIDER THE FOLLOWING:**

- Municipalities should set up a separate, interest bearing-bank account for the American Rescue Plan funding. Interest collected on the funds is not required to be paid back to the U.S. Treasury or required to comply with ARPA regulations.
- Municipalities must submit a Project and Expenditure Report annually by October 31st (covering Federal Fiscal Year October 1st through September 30th)
- First report due October 31, 2021, covering date of award through September 30, 2021

**5**  
categories

- Support public health expenditures
- Address negative economic impacts caused by the public health emergency
- Replace lost public sector revenue
- Provide premium pay for essential workers
- Invest in water, sewer, and broadband infrastructure

“To assess whether a program or service is included in the first two categories of eligible uses, a recipient should consider whether and how the use would **RESPONDS** to the COVID19.”

“In order to determine if a program or service “responds to” the COVID19, the recipient must:

1. identify a need or negative impact of the COVID-19 public health emergency;
2. identify how the program, service, or other intervention addresses the identified need or impact.”

Crawford County Planning recommends that anything funded under the first two categories, support public health expenditures or address negative economic impacts caused by the public health emergency, should document this federal guidance.

**SUPPORT PUBLIC HEALTH EXPENDITURES<sup>1</sup>**

Services + Programs to contain and mitigate the spread

- Vaccination programs
- Testing, Contact tracing
- PPE purchases
- Support for vulnerable populations to access medical or public health services
- Public communication efforts
- Enhancement of healthcare capacity, including alternative care facilities
- Support for prevention, mitigation, or other services in congregate living facilities and schools
- Capital investments in public facilities to meet pandemic operational needs

Services to address behavioral healthcare needs exacerbated by the pandemic

Payroll and covered benefits expenses for public health, healthcare, human services, public safety and similar employees, to the extent that they work on the COVID-19 response

**MUNICIPALITIES CANNOT DO THE FOLLOWING WITH ARPA FUNDING**

- Replenishing reserves or rainy-day funds
- Contributions to pension accounts
- Capital investment other than that equal to lost revenue
- Interest or principal payments on outstanding debt
- Paying settlements or judgements

**REPLACING LOST PUBLIC SECTOR REVENUE<sup>1</sup>**

Recipients can compare their actual revenue to an alternate revenue created from a base year that has been projected with a growth rate. Recipients may immediately calculate the reduction in revenue that occurred in 2020 and deploy funds to address any shortfall.

Recipients should calculate revenue on an entity-wide basis

Recipients will have the opportunity to re-calculate revenue loss at several points through the program. Recipients are permitted to calculate the extent of reduction in revenue as of four points in time: December 31, 2020; December 31, 2021; December 31, 2022; and December 31, 2023

- See back page for definition of General Revenue
- The base year should be 2019
- Recipients can use a 4.1% growth rate to calculate lost revenue or may average annual revenue growth over the three full fiscal years prior to the public health emergency ( use the higher growth rate)

Replacement of lost revenue must be spent on “general government services”. This is a flexible topic; however, it must be documented correctly in order to use this funding. Local municipalities can, but are not limited to, making road and bridge improvements, upgrading public facilities, purchasing equipment under this category. Municipalities can’t pay debt, invest in a rainy day fund, make contributions to pensions, or pay settlements or judgements.

**ADDRESS NEGATIVE ECONOMIC IMPACTS CAUSED BY THE PUBLIC HEALTH EMERGENCY<sup>1</sup>**

Services + Programs to restart the economy

- Delivering assistance to workers and families
- Supporting small businesses
- Speeding the recovery of the tourism, travel, and hospitality sectors
- Rebuilding public sector capacity

Serving the hardest-hit communities and families

- Addressing health disparities and the social determinants of health
- Investments in housing and neighborhoods
- Addressing educational disparities
- Promoting healthy childhood environments

**PROVIDE PREMIUM PAY FOR ESSENTIAL WORKERS**

Additional guidance is available from the Planning Office should your community be interested in paying essential workers premium pay.

**INVEST IN WATER, SEWER, AND BROADBAND INFRASTRUCTURE<sup>1</sup>**

Investments in drinking water infrastructure projects

- Building or upgrading facilities and transmission, distribution, and storage systems
- Replacement of lead lines

Investments in wastewater infrastructure projects

- Constructing publicly-owned treatment infrastructure
- Managing and treating stormwater or subsurface drainage water
- Facilitating water reuse
- Securing publicly-owned treatment works

Investments in broadband infrastructure projects

- Building broadband infrastructure with modern technologies in mind, specifically projects that deliver services offering reliable 100 Mbps download and 100 Mbps upload speeds

Recipients are encouraged to ensure that projects use strong labor standards, including project labor agreements and community benefits agreements that offer wages at or above the prevailing rate and include local hire provisions.

<sup>1</sup>The examples provided are not all-inclusive and are used to provide insight on the types of projects/programs available.