



# Lewis County, WA

Internal ARPA Projects Handbook

American Rescue Plan Act (ARPA) State and Local Fiscal  
Recovery Funds (SLFRF)

Version 1.0



**Submitted by:**

BerryDunn  
2211 Congress Street  
Portland, ME 04102-1955  
207.541.2200

**Bill Brown, Principal**

[BBrown@berrydunn.com](mailto:BBrown@berrydunn.com)

**Steven Whitney, Senior Project Manager**

[swhitney@berrydunn.com](mailto:swhitney@berrydunn.com)

**Submitted On:**

November 2, 2022

[berrydunn.com](http://berrydunn.com)

## Table of Contents

1.0 Purpose .....	1
2.0 ARPA Overview .....	2
3.0 Roles and Responsibilities .....	3
3.1 Auditor’s Office: Financial Services.....	3
3.2 Budget Department.....	3
3.3 Departments of the County .....	3
4.0 Uniform Administrative Requirements .....	5
4.1 Allowable Activities (A) .....	6
4.2 Allowable Costs/Cost Principles (B).....	6
4.3 Cash Management (C) .....	7
4.4 Eligibility (E).....	7
4.5 Equipment and Real Property Management (F).....	7
4.6 Matching, Level of Effort, Earmarking (G).....	8
4.7 Period of Performance (H).....	8
4.8 Procurement, Suspension, and Debarment (I).....	9
4.8.1 Procurement.....	9
4.8.2 Suspension and Debarment .....	9
4.9 Program Income (J).....	10
4.10 Reporting (L).....	11
4.10.1 Types of Required Reports.....	11
4.10.2 Submission of Required Reporting .....	12
4.11 Subrecipient Monitoring (M).....	12
4.11.1 Risk Assessment.....	12
4.11.2 Monitoring .....	13
4.12 Special Tests and Provisions (N).....	14
5.0 Other Grant Requirements .....	15



5.1 Maintenance of Records ..... 15

5.2 Single Audit ..... 16

5.3 Lobbying ..... 16

6.0 Closeout Phase ..... 17

## 1.0 Purpose

The Coronavirus State and Local Fiscal Recovery Funds (SLFRF) program—a part of the American Rescue Plan Act (ARPA)—delivered \$350 billion to state, local, and Tribal governments across Lewis County (the County) to support its response to and recovery from the COVID-19 public health emergency.

The County received approximately \$15.7 million in two tranches of funding in 2021 and 2022 to support its response to and recovery from the COVID-19 public health emergency.

**The County is considered a Prime Recipient of SLFRF funding.** As a department of the County receiving this funding, you will be required to follow the guidelines of a Prime Recipient. As a County, numerous compliance and reporting requirements need to be adhered to in order to successfully administer this program.

This handbook provides an orientation on recipients' compliance responsibilities and the U.S. Department of the Treasury's (U.S. Treasury's) expectations and recommended best practices, where appropriate, under the SLFRF program. The U.S. Treasury developed several guiding principles:

- Recipients and subrecipients are the first line of defense and are responsible for working to ensure SLFRF is not used for ineligible purposes, and there is no fraud, waste, or abuse associated with the SLFRF award.
- Many SLFRF-funded projects respond to the COVID-19 public health emergency and meet urgent community needs. Swift and effective implementation is vital, and recipients must balance facilitating simple and rapid program access widely across the community and maintaining a robust documentation and compliance regime.
- The U.S. Treasury encourages recipients to use SLFRF-funded projects to advance shared interests and promote equitable delivery of government benefits and opportunities to underserved communities.
- Transparency and public accountability for SLFRF and use of such funds are critical to upholding program integrity and trust in all levels of government.

## 2.0 ARPA Overview

Congratulations on receiving a portion of the County’s ARPA allocation under the SLFRF program. This program helps ensure governments have the resources needed to conduct the following:

- Fight the pandemic and support families and businesses struggling with COVID-19-related public health and economic impacts
- Maintain vital public services even amid declines in revenues
- Build a strong, resilient, and equitable recovery by making investments that support long-term growth and opportunity

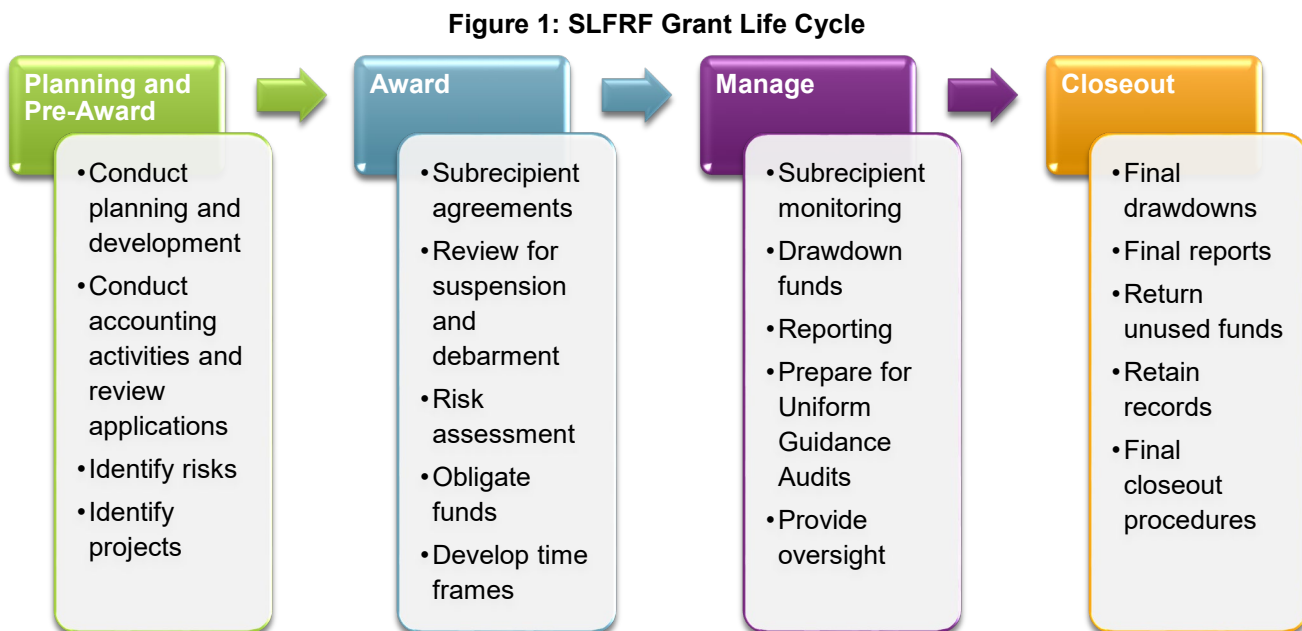
The U.S. Treasury released the Final Rule for the program, which took effect on April 1, 2022. We encourage you to visit the U.S. Treasury’s website for SLFRF, which can be found at the URL below to learn more about this funding.

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

Additionally, the U.S. Treasury periodically updates its Frequently Asked Questions (FAQs). Please monitor and read these FAQs at the below URL.

<https://home.treasury.gov/system/files/136/SLFRF-Final-Rule-FAQ.pdf>

Figure 1 below illustrates the four key aspects to the life cycle for SLFRF and all other federal grants.



## 3.0 Roles and Responsibilities

### 3.1 Auditor's Office: Financial Services

The Auditor's Office will be responsible for coordinating and overseeing the following:

- Accounts Payable
- Payroll expenditures
- Managing the General Ledger
- Monitoring
- Procurement review and compliance
- Providing guidance on how best to comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 Code of Federal Regulations (CFR) Part 200 (the Uniform Guidance)

### 3.2 Budget Department

The Budget Department will be responsible for coordinating and overseeing the departments as it relates to the following:

- Reporting
- Reviewing Request for Proposals (RFPs), bids, and contracts related to SLFRF
- Reviewing and approving project eligibility
- Other administrative services, as needed

### 3.3 Departments of the County

Departments under the SLFRF program are considered Prime Recipients of SLFRF financial assistance. Departments' compliance responsibilities will generally be subject to the requirements of the Uniform Guidance, and will include:

- Administering projects
- Adhering to the Uniform Guidance
- Developing and maintaining sound internal controls related to financial reporting and compliance
- Confirming and documenting verification of Unique Entity Identifier (UEI) for any contractor/vendor via the System for Award Management (SAM) website, <http://www.SAM.gov>
- Submitting vendor/contractor suspension and debarment certification to the Auditor's Office

- Timely submission of Project Budget sheet
- Timely submission of monthly reimbursement requests (if applicable)
- Timely submission of all required grant reporting and reconciliation to the Auditor's Office
- Adhering to data requests, reviews, and audits; working to ensure proper records management of all records related to these funds in accordance with grant requirements (e.g., emails, eligibility documents)
- Adhering to all requirements in the Grant Agreements and Grant Terms and Conditions
- Complying with SLFRF statute, SLFRF Award Terms and Conditions, the U.S. Treasury's interim final rule and final rule, applicable federal statutes, regulations, and reporting requirements

## 4.0 Uniform Administrative Requirements

The SLFRF are federal funds received through the **U.S. Treasury’s Assistance Listing Number (ALN) 21.027 Coronavirus SLFRF**. Federal funds are subject to the requirements identified under the Uniform Guidance. The summaries below are only general summaries, and all departments are advised to carefully review the Uniform Guidance requirements and any additional regulatory and statutory requirements applicable to the program.

**Figure 2: Uniform Guidance – Matrix of Compliance Requirements**



## 4.1 Allowable Activities (A)

Under the Final Rule issued by the U.S. Treasury on January 6, 2021, recipients may use the federal awards to do the following:

- Support public health expenditures by funding COVID-19 mitigation efforts, medical expenses, behavioral healthcare, and certain public health and safety staff
- Address negative economic impacts caused by the public health emergency, including economic harms to workers, households, small businesses, impacted nonprofits, and the public sector
- Provide premium pay for essential workers, offering additional support to those who have borne and will bear the greatest health risks because of their service in critical infrastructure sectors
- Invest in water, sewer, and broadband infrastructure, making necessary investments to improve access to clean drinking water, support vital wastewater and stormwater infrastructure, and expand access to broadband internet

The Final Rule also states the following activities are specifically **not permitted**:

- A recipient may not use funds for deposits into any pension fund
- A recipient may not use funds to contribute to rainy day funds, financial reserves, or similar funds
- A recipient may not use funds to either directly or indirectly offset a reduction in the net tax revenue of the entity resulting from a coverage change during the covered period

Increased federal funding has escalated the risk of entities “double dipping” (i.e., using federal funds for the same expense twice). The County and its departments should have policies and procedures in place to avoid any “double dipping” of federal awards.

The County and its departments must develop and implement effective internal controls to help ensure funding decisions under the SLFRF award constitute eligible uses of funds and to document determinations.

**The County Commissioners approved each project based on the applicant’s proposed project outline. Each project was deemed allowable under the Final Rule. All expenditures should be used specifically for the approved project. If a department has excess funds, it must communicate this immediately to the County.**

## 4.2 Allowable Costs/Cost Principles (B)

As outlined in the Uniform Guidance in 2 CFR Part 200, Subpart E regarding Cost Principles, allowable costs are based on the premise that sound management practices and administration

of federal funds should be in a manner consistent with the project objectives and terms and conditions of the award.

Consistent with the Final Rule, administrative costs are allowable for projects funded with SLFRF, including costs of consultants to support effective management and oversight, such as consultation to help ensure compliance with legal, regulatory, and other requirements. Further, costs must be reasonable and allocable, as outlined in 2 CFR § 200.404 and 2 CFR § 200.405. Pursuant to the Final Rule, recipients are permitted to charge both direct and indirect administrative costs to their award.

Direct administrative costs are those identified specifically as the costs of implementing the SLFRF program objectives, such as contract support, materials, and supplies for a project. Indirect administrative costs are an organization's general overhead costs, where a portion of such costs is allocable to the SLFRF award (e.g., the cost of facilities or administrative functions, such as a director's office). Each category of cost should be treated consistently in like circumstances as direct or indirect, and recipients may not charge the same administrative costs to both direct and indirect cost categories or to other programs.

#### 4.3 Cash Management (C)

SLFRF payments made to recipients are not subject to the requirements of the Cash Management Improvement Act nor the U.S. Treasury's implementing regulations at 31 CFR Part 205 or 2 CFR § 200.305(b)(8) – (9).

As such, recipients can place funds in interest-bearing accounts, do not need to remit interest to the U.S. Treasury, and are not limited to using that interest for eligible uses under the SLFRF award.

The County will keep funds in a separate special revenue fund and will use pooled cash across the funds.

#### 4.4 Eligibility (E)

Each department is responsible for adhering to the eligibility requirements of the specific project the department was awarded under. The department must develop and implement policies and procedures to help ensure it follows the eligibility requirements outlined in its specific grant award and terms and conditions.

#### 4.5 Equipment and Real Property Management (F)

Any purchases of equipment or real property with SLFRF must be consistent with 2 CFR Part 200, Subpart D of the Uniform Guidance. Any equipment and real property acquired with SLFRF must be used for the originally authorized purpose. Consistent with 2 CFR § 200.311 and 2 CFR § 200.313, any equipment or real property acquired using SLFRF shall vest in the non-federal entity. Any acquisition and maintenance of equipment or real property must also comply with relevant laws and regulations. Any equipment purchases in excess of \$1 million require

preapproval from the U.S. Treasury; therefore, departments must obtain prior approval from the County before spending \$1 million.

Exhibit A outlines use requirements by category from the U.S. Treasury.<sup>1</sup>

#### Exhibit A: U.S. Treasury Use Requirements

Category	Use Requirements
Public Health and Assistance to Households and Individuals	Property, supplies, or equipment last reported as being used to respond to the public health impacts of the public health emergency, as outlined in 31 CFR 35.6(b)(3)(i), or being used for the provision of services to households provided in 31 CFR 35.6(b)(3)(ii)(A), are authorized to fulfill any eligible use of funds provided in these subparagraphs of the Final Rule.
Assistance to Small Businesses, Nonprofits, and Impacted Industries	Property, supplies, or equipment last reported as being used for the provision of services to small businesses, nonprofits, and impacted industries outlined in 31 CFR 35.6(b)(3)(ii)(B)-(D) are authorized to fulfill any eligible use of funds outlined in the public health and negative economic impacts eligible use category.
Water, Sewer, or Broadband Infrastructure	Property, supplies, or equipment last reported as being used to make investments in water, sewer, or broadband infrastructure pursuant to 31 CFR 35.6(e) are authorized to fulfill any eligible use of funds outlined in the water, sewer, and broadband infrastructure eligible use category.
Government Services/Revenue Loss	Property, supplies, or equipment acquired with revenue loss funds are exempt from the use and disposition requirements of the Uniform Guidance, regardless of award size.
Premium Pay	N/A

#### 4.6 Matching, Level of Effort, Earmarking (G)

No matching, level of effort, or earmarking compliance responsibilities are associated with the SLFRF award.

#### 4.7 Period of Performance (H)

SLFRF may only be used for costs incurred within a specific period, beginning March 3, 2021, with all funds obligated by December 31, 2024, and all funds spent by December 31, 2026. This is known as the Period of Performance, and all departments must adhere to this requirement.

---

<sup>1</sup> The U.S. Department of the Treasury. *Coronavirus State and Local Fiscal Recovery Funds Final Rule: Frequently Asked Questions*. Treasury.gov, July 27, 2022. Accessed October 3, 2022. <https://home.treasury.gov/system/files/136/SLFRF-Final-Rule-FAQ.pdf>

## 4.8 Procurement, Suspension & Debarment (I)

### 4.8.1 Procurement

Recipients are responsible for helping to ensure that any procurement using SLFRF, or payments under procurement contracts using such funds, are consistent with the procurement standards set forth in the Uniform Guidance at 2 CFR § 200.317 through 2 CFR § 200.327, as applicable. The Uniform Guidance establishes in 2 CFR § 200.319 that all procurement transactions for property or services must be conducted in a manner providing full and open competition, consistent with standards outlined in 2 CFR § 200.320, which allows for non-competitive procurements only in circumstances where at least one of the conditions below is true:

- The item is below the micro-purchase threshold
- The item is only available from a single source
- The public exigency or emergency will not permit a delay from publicizing a competitive solicitation
- After solicitation of several sources, competition is determined inadequate

Recipients must have and use documented procurement procedures consistent with the standards outlined in 2 CFR § 200.317 through 2 CFR § 200.320. The Uniform Guidance requires an infrastructure for competitive bidding and contractor oversight, including maintaining written standards of conduct and prohibitions on dealing with suspended or debarred parties. Departments must help ensure adherence to all applicable local, state, and federal procurement laws and regulations.

The Davis-Bacon Act requirements (prevailing wage rate) do not apply to projects funded **solely** with award funds from the SLFRF program. If the project is funded with other sources of federal funding, the Davis-Bacon Act might apply. The project may be subject to Washington State prevailing wage law as defined in RCW 39.04. Recipients must review these requirements and determine if state prevailing wage law applies.

The departments must also follow all local policies established under Resolution No. 16-344. – Establishing Procedures for the Procurement of Goods and Services – “Procurement Procedure Manual.” The departments are responsible for following all statutory requirements related to purchasing, bidding, and contracting.

The County has developed an RFP Checklist for SLFRF-related bids. Please reach out to the Budget Department for a copy.

### 4.8.2 Suspension and Debarment

All subrecipients, beneficiaries, and contractors receiving SLFRF are required to be registered with the System for Award Management (SAM) and obtain a UEI number.

- **Requirement for SAM:** Unless the subrecipient is exempt from this requirement under 2 CFR 25.110, the subrecipient must enroll in SAM and help ensure the information in the

system is up to date and accurate until the subrecipient submits the final financial report required under this grant or receives the final payment, whichever is later. This requires the subrecipient to review and update the information at least annually after the initial registration, and more frequently if required by changes in information or another award term. Additional information about registration procedures may be found at the SAM website (<http://www.sam.gov>).

- **Requirement for UEI:** The entity must provide its UEI number as part of accepting the grant. If the subrecipient does not have a UEI number, the subrecipient must apply for one. A UEI number may be obtained at the SAM website (<http://www.sam.gov>).

Subrecipients may not receive SLFRF if they are suspended or debarred by the federal government. Suspension and debarment are when a federal agency or official takes action to exclude an individual or organization from participating in transactions involving certain federal funds. Suspension is for a specific period, whereas debarment is a permanent ban.

When entering a covered transaction, as defined by 2 CFR § 180.200, the subrecipient must:

- Verify the non-federal entity is eligible to participate in this federal project by:
  - Checking the excluded parties list system (EPLS), as maintained within the SAM, to determine if a non-federal entity is excluded or disqualified, or
  - Collecting a certification statement from the non-federal entity attesting the subrecipient is not excluded or disqualified from participating, or
  - Adding a clause or condition to covered transactions attesting the individual or firm is not excluded or disqualified from participating
- Require prime contractors to comply with 2 CFR § 180.330 when entering lower-tier transactions (e.g., subcontracts)
- Immediately disclose to the County whenever the subrecipient: (1) learns it has entered a covered transaction with an ineligible entity or (2) suspends or debar a contractor, person, or entity

#### 4.9 Program Income (J)

Program income includes income under a specific SLFRF project from fees for services performed, the use of rental of real or personal property acquired under federal awards, and principal and interest on loans made with federal award funds.

Uniform Guidance outlines the requirements that pertain to program income at 2 CFR § 200.307 and can be found here: <https://www.federalregister.gov/documents/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>.

If you believe you have generated program income, please contact the Auditor's Office.

## 4.10 Reporting (L)

The SLFRF program identifies a single set of reporting requirements for Expenditure and Performance data for the full amount of ARPA funds received by the County. The County is responsible for gathering all necessary documentation from departments receiving a subaward from the County.

### 4.10.1 Types of Required Reports

#### Project and Expenditure Reports

These reports are required on a quarterly basis and are due one month after the end of the quarter. These reports include Expenditure and Programmatic data, including funding, expenditures, project status, demographic information on the population receiving the benefit, and required Programmatic Data in conjunction with the Expenditure Categories outlined in the Final Rule. The reports also include specific reporting requirements for contractors and subrecipients that received more than \$50,000 from the Federal Funding Accountability and Transparency Act (FFATA).

Table 1 below outlines the due dates of each project and expenditure report.

**Table 1: Quarterly Project and Expenditure Report Timeline**

Report	Year	Quarter	Period Covered	Due Date
1	2021	2 – 4	March 3 – December 31	January 31, 2022
2	2022	1	January 1 – March 31	April 30, 2022
3	2022	2	April 1 – June 30	July 31, 2022
4	2022	3	July 1 – September 30	October 31, 2022
5	2022	4	October 1 – December 31	January 31, 2023
6	2023	1	January 1 – March 31	April 30, 2023
7	2023	2	April 1 – June 30	July 31, 2023
8	2023	3	July 1 – September 30	October 31, 2023
9	2023	4	October 1 – December 31	January 31, 2024
10	2024	1	January 1 – March 31	April 30, 2024
11	2024	2	April 1 – June 30	July 31, 2024
12	2024	3	July 1 – September 30	October 31, 2024
13	2024	4	October 1 – December 31	January 31, 2025
14	2025	1	January 1 – March 31	April 30, 2025
15	2025	2	April 1 – June 30	July 31, 2025
16	2025	3	July 1 – September 30	October 31, 2025
17	2025	4	October 1 – December 31	January 31, 2026

Report	Year	Quarter	Period Covered	Due Date
18	2026	1	January 1 – March 31	April 30, 2026
19	2026	2	April 1 – June 30	July 31, 2026
20	2026	3	July 1 – September 30	October 31, 2026
21	2026	4	October 1 – December 31	March 31, 2027

#### 4.10.2 Submission of Required Reporting

The Budget Department requires all departments submit monthly reports that show life-to-date obligations and life-to-date expenditures; the Budget Department will provide the template. Monthly reporting will allow the County to monitor ongoing activities in a timely manner.

The County may also require subrecipients to submit quarterly programmatic information based on the unique nature of each project and the related expenditure category, as defined by the U.S. Treasury.

#### 4.11 Subrecipient Monitoring (M)

As noted in Section 3.0, Roles and Responsibilities, the County is required, in accordance with 2 CFR 200.1, to manage and monitor the subrecipients to help ensure compliance with the requirements of Uniform Guidance and the SLFRF.

Under the SLFRF program, some subrecipients will further subaward the funds to sub-subrecipients. Please refer to your individual grant awards to further understand if your grant will have or can give subawards. The use of subawards of the grant requires preapproval and discussion with the County. See the required elements under Section 4.11.2 Monitoring.

Please check with the Auditor’s Office to see if your department has any subrecipients.

##### 4.11.1 Risk Assessment

In accordance with 2 CFR Part 200.332(b), each subrecipient that subawards SLFRF to another entity (a sub-subrecipient) is required to “evaluate each [sub-subrecipient’s] risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for the purposes of determining the appropriate subrecipient monitoring.”

Each subrecipient that subawards should develop a risk assessment process that clearly documents the steps performed as well as how the outcomes of the preliminary risk assessment subsequently impact the subrecipient’s plans to monitor its sub-subrecipients. This process should include assigning risk ratings to each sub-subrecipient based on assessments performed. Please refer to the Subrecipient Monitoring Handbook for more guidance. The handbook contains a sample questionnaire that can be used to obtain the information necessary to complete the preliminary risk assessment.

This risk assessment should be updated annually to incorporate relevant information, such as results of monitoring activities, results of subrecipient audits, and other relevant factors.

Risk assessments must be specific to the funding source. In the event a subrecipient receives multiple subawards from the County, a separate risk assessment must be completed for each funding source.

#### 4.11.2 Monitoring

The purpose of monitoring, as defined by 2 CFR § 200.332, is to “monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.”

The subrecipients that subaward SLFRF must establish processes for monitoring their sub-subrecipients using a risk-based approach, as required by 2 CFR § 200.332 (d). At minimum, the monitoring should include the following activities:

- Reviewing financial and performance reports required by the County.
- Following up and helping to ensure the sub-subrecipient takes timely and appropriate action on all deficiencies pertaining to the federal award provided to the sub-subrecipient, detected through audits, on-site reviews, and written confirmation from the sub-subrecipient, highlighting the status of actions planned or taken to address Single Audit findings related to the particular subaward.
- Issuing a management decision for applicable audit findings pertaining only to the federal award provided to the subrecipient from the pass-through entity, as required by 2 CFR § 200.521.
- Ensuring the subrecipients resolve audit findings specifically related to the subaward to the sub-subrecipient and are not responsible for resolving cross-cutting findings (an audit finding where the same underlying condition or issue affects federal awards of more than one federal awarding agency or pass-through entity). If a sub-subrecipient has a current Single Audit report posted in the Federal Audit Clearinghouse and has not otherwise been excluded from receipt of federal funding (e.g., has been debarred or suspended), the subrecipient may rely on the sub-subrecipient's cognizant audit agency or cognizant oversight agency to perform audit follow-up and make management decisions related to cross-cutting findings in accordance with 2 CFR § 200.513(a)(3)(vii). Such reliance does not eliminate the responsibility of the subrecipient to issue sub-subawards that conform to agency- and award-specific requirements, to manage risk through ongoing monitoring of the sub-subaward to the sub-subrecipient, and to monitor the status of the findings specifically related to the sub-subaward.

The subrecipients with subawards to sub-subrecipients are also responsible for developing a process to:

- Verify that every sub-subrecipient is audited, as required by Subpart F, when it is expected that the sub-subrecipient's federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in 2 CFR § 200.501.

- Consider whether the results of the sub-subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the subrecipient's own records.
- Consider taking enforcement action against noncompliant sub-subrecipients, as described in 2 CFR § 200.339.

Any subrecipient that intends on transferring funds to a beneficiary should consult the County and obtain preapproval.

#### 4.12 Special Tests and Provisions (N)

At the time of this report, no specific special tests or provisions exist. The U.S. Treasury may issue sub regulatory guidance as well as FAQs.

## 5.0 Other Grant Requirements

### 5.1 Maintenance of Records

The department should help ensure it maintains appropriate documentation to support all uses of the SLFRF. The department is required to maintain records and financial documentation sufficient to help ensure compliance with all applicable guidance and regulations.

The below list provides examples of documentation that should be maintained:

- Policies and procedures for the administration of federal funds
- Monitoring or audit reports
- General Ledger used to account for SLFRF activity
- Budget records
- Payroll, time records, and Human Resources records to support costs incurred for all payroll expenses related to the SLFRF award
- Invoices for and receipts of purchases made related to the SLFRF award
- Contracts and subcontracts entered into using SLFRF payments and documents related to such contracts
- Grant agreements
- All procurement-related materials, including RFPs, scoring materials, and records of negotiations
- All internal and external emails related to use of SLFRF payments

These records are to be maintained in accordance with accounting procedures and practices, which sufficiently and properly reflect all such costs and expenses and are acceptable to the County to include, without limitation, all ledgers, books, records, and original evidence of costs such as purchase requisitions and orders, vouchers, requisitions for materials, inventories, valuations of in-kind contributions, labor timecards, payrolls, and other records requested or required by the County.

Financial records, supporting documents, statistical records, and all other non-federal entity records pertinent to the federal award must be retained for a **period of five years** from the date of submission of the final expenditure report.

#### Best Practices

- Develop a written document-retention policy
- Establish a central place to store documents
- Maintain documents for a minimum of five years after all SLFRF has been expended

## 5.2 Single Audit

The County and all its departments will be subject to an audit under the Single Audit Act and its implementing regulation of 2 CFR § 200, Subpart F, regarding audit requirements.

The Office of Management and Budget (OMB) Compliance Supplement provides information on existing important compliance requirements the federal government expects to be considered as part of such audit.

SLFRF is considered to be high risk and will undergo an annual Single Audit.

## 5.3 Lobbying

State and local agencies are permitted to conduct lobbying work directly on policy-related matters across the agencies' equivalent branches of state or local government. This derives from language in Section 503 permitting communications through a normal and recognized executive-legislative relationship and permitting recipients to participate in policymaking and administrative processes within the executive branch of their state or local government, if within these boundaries. These types of lobbying activities would not require disclosure on a lobbying disclosure form.

Per the U.S. Treasury's website: "If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions."

## 6.0 Closeout Phase

Closeout is the process by which the department determines that all applicable administrative actions and all required work of its grant award have been completed. This is the completion of the grant award life cycle. Closeout is a process that takes place prior to and after the expiration or termination of the project or the grant period.

The County will close out grant awards when the department completes all applicable administrative actions and all required work of the award. This includes submission of all required reports under the SLFRF, reconciliation of cash balances, and final disposition of property. The County will make every effort to complete the closeout process for each award no later than 180 days after receipt and acceptance of all required federal reports.

The purpose of closeout is to help ensure:

- Final reports are received and evaluated
- Allowable costs are determined
- Amounts due to the County are determined, and payment arrangements are made

As a grant recipient, each department must meet several requirements before closing out a grant in the final budget period of the project. Preparation for closeout should begin three months prior to the end date of the grant in order to accurately forecast expenses and adjust any entries that need to be made. Closeout reports must be submitted within 120 days of the end of the project period.