



# **AMERICAN RESCUE PLAN ACT OF 2021**

## **Coronavirus State and Local Fiscal Recovery Funds**

### **Program Manual**

**April 18, 2023 | Version 2.0**

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# 1 INTRODUCTION

## 1.1 PURPOSE

This manual contains information and requirements for administering the Federal American Rescue Plan Act of 2021 Coronavirus State and Local Fiscal Recovery Funds distributed to the City of Gainesville.

## 1.2 AMERICAN RESCUE PLAN ACT OF 2021 (“ARPA”)

On March 10, 2021, the House of Representatives approved a Senate-amended version of President Biden's \$1.9 trillion COVID-19 relief package - the American Rescue Plan. The package includes \$350 billion in aid for state and local governments, along with additional funding for other areas like education, rental assistance, and transit. The President signed the bill into law on March 11, 2021.

The American Rescue Plan Act of 2021 (“ARPA”) through the Coronavirus State and Local Fiscal Recovery Funds (SLFRF) program, provides \$350 billion in additional funding for state, local, and Tribal governments across the country to support their response to and recovery from the COVID-19 public health emergency.

The state funding portion is approximately \$195 billion with \$25.5 billion distributed equally among the 50 states and the District of Columbia and the remaining amount distributed according to a formula based on unemployment. The local funding portion is approximately \$130 billion, equally divided between cities and counties. Localities will receive the funds in two tranches – the first 50% after the U.S. Treasury (“Treasury”) certifies the proceeds to each jurisdiction and the second remaining balance one year later. Treasury will distribute funds directly to each eligible state, territory, metropolitan city, county, or Tribal government.

For cities, \$65 billion is divided between jurisdictions that are Community Development Block Grant (“CDBG”) entitlement jurisdictions and those that are not. \$45.5 billion of the \$65 billion will be allocated to metropolitan cities utilizing a modified CDBG formula, and the remaining amount for jurisdictions that are non-entitlement CDBG, will be allocated according to population. For the non-entitlement jurisdictions, the amount will not exceed 75% of their most recent budget as of January 27, 2020. Additionally, non-entitlement jurisdictions proceeds will be allocated through the state for redistribution to local governments.

As with previous COVID-19 relief packages, implementation will be an extensive process as new or updated guidance and FAQs are developed and released by Treasury. On January 6, the Treasury released the Final Rule and an Overview of the Final Rule document for the SLFRF program.

## 1.3 TIMELINE FOR EXPENDITURES

The City may use SLFRF funds to cover eligible costs beginning March 3, 2021. SLFRF funds must be obligated by December 31, 2024 and expended by December 31, 2026. Costs for projects incurred by the City prior to March 3, 2021, are not eligible, as provided for in Treasury’s final rule.

## 1.4 ALLOWABLE EXPENDITURES

As a recipient of an SLFRF award, the City has substantial discretion to use the award funds in the ways that best suit the needs of its constituents – if such use fits into one of the following four statutory categories:

- To respond to the COVID-19 public health emergency or its negative economic impacts.
- To respond to workers performing essential work during the COVID-19 public health emergency by providing premium pay to eligible workers of the recipient that are performing such essential work, or by providing grants to eligible employers that have eligible workers who perform essential work.
- For the provision of government services, to the extent of the reduction in revenue of such recipient due to the COVID–19 public health emergency, relative to revenues collected in the most recent full fiscal year of the recipient prior to the emergency; or
- To make necessary investments in water, sewer, or broadband infrastructure.

## 1.5 UNALLOWABLE EXPENDITURES

Recipients may not use funds to:

- Deposit into any pension fund.
- Debt service, even if the expenses would otherwise be eligible (such as broadband infrastructure).
- Replenishing financial reserves such as rainy-day funds.
- Satisfaction of settlements or judgments, unless the settlement requires the recipient to provide services; or incur other costs that are an eligible use of SLFRF funds.
- Programs, services, or capital expenditures that undermine efforts to stop the spread of COVID-19.
- Expenses that violate the award terms and conditions or other laws and regulations (such as laws regarding procurement, contracting, conflicts of interest, environmental standards, or civil rights).

## 1.6 ASSISTANCE LISTING NUMBER

The Assistance Listing Number (“ALN”) is the unique 5-digit number assigned to identify a federal assistance listing and can be used to search for federal assistance program information, including funding opportunities, spending on USASpending.gov, or audit results through the Federal Audit Clearinghouse. The assistance listing includes helpful information including program purpose, statutory authority, eligibility requirements, and compliance requirements for recipients.

The Assistance Listing for the SLFRF was published May 28, 2021, on SAM.gov under ALN, formerly known as CFDA Number, 21.027.

To expedite payments and meet statutory timelines Treasury issued initial payments under an existing ALN, 21.019, assigned to the CFR. Recipients must use ALN 21.027 for all financial accounting, subawards, and associated program reporting requirements for the SLFRF awards.

## 1.7 AWARD TERMS AND CONDITIONS

The Award Terms and Conditions of the SLFRF financial assistance agreement sets forth the compliance obligations for recipients pursuant to the SLFRF statute, the Uniform Guidance, Treasury’s final rule, and applicable federal laws and regulations. Recipients should ensure they remain in compliance with all Award Terms and Conditions. These obligations include the following requirements in addition to those described above:

- **SAM.gov Requirements.** The City is required to have an active registration with the System for Award Management (“SAM”) (<https://www.sam.gov>) pursuant to 2 CFR Part 25.
- **Recordkeeping Requirements.** Generally, the City must maintain records and financial documents for five years after all funds have been expended or returned to Treasury, as outlined in paragraph 4.c. of the Award Terms and Conditions. Treasury may request transfer of records of long-term value at the end of such period. Wherever practicable, such records should be collected, transmitted, and stored in open and machine-readable formats. The City must agree to provide or make available such records to Treasury upon request, and to the Government Accountability Office (“GAO”), Treasury’s Office of Inspector General (“OIG”), and their authorized representative to conduct audits or other investigations.
- **Single Audit Requirements.** The City expends more than \$750,000 in Federal awards during the fiscal year and therefore will be subject to an audit under the Single Audit Act and its implementing regulation at 2 CFR Part 200, Subpart F regarding audit requirements. The Compliance Supplement provides information on the existing, important compliance requirements that the federal government expects to be considered as a part of such audit. The Compliance Supplement is routinely updated and is made available in the Federal Register and on OMB’s website: <https://www.whitehouse.gov/omb/office-federal->

financial-management/ Recipients and subrecipients should consult the Federal Audit Clearinghouse to see examples of Single Audit submissions.

- **Civil Rights Compliance.** The City. As a recipient of Federal financial assistance from the Treasury, is required to meet legal requirements relating to nondiscrimination and nondiscriminatory use of Federal funds. Those requirements include ensuring that the City does not deny benefits or services, or otherwise discriminate on the basis of race, color, national origin (including limited English proficiency), disability, age, or sex (including sexual orientation and gender identity), in accordance with the following authorities: Title VI of the Civil Rights Act of 1964 (Title VI) Public Law 88-352, 42 U.S.C. 2000d-1 et seq., and the Department's implementing regulations, 31 CFR part 22; Section 504 of the Rehabilitation Act of 1973 (Section 504), Public Law 93-112, as amended by Public Law 93-516, 29 U.S.C. 794; Title IX of the Education Amendments of 1972 (Title IX), 20 U.S.C. 1681 et seq., and the Department's implementing regulations, 31 CFR part 28; Age Discrimination Act of 1975, Public Law 94-135, 42 U.S.C. 6101 et seq., and the Department implementing regulations at 31 CFR part 23.

To carry out its enforcement responsibilities under Title VI of the Civil Rights Act, Treasury will collect and review information from the City to ascertain compliance with the applicable requirements before and after providing financial assistance. Treasury's implementing regulations, 31 CFR part 22, and the Department of Justice (DOJ) regulations, Coordination of Non-discrimination in Federally Assisted Programs, 28 CFR part 42, provide for the collection of data and information from recipients (see 28 CFR 42.406).

## 1.8 GRANTS MANUAL

Non-federal entities, including municipal governments, are required by the federal Uniform Guidance regulations, 2 CFR Part 200, to have policies which establish uniform administrative requirements and cost principles for federal awards.

The City is committed to following the Post Federal Award Requirements outlined by the Uniform Guidance in 2 CFR Part 200, subpart D.

It is the responsibility of the City's Department of Financial Services to promulgate Finance policies, procedures, and guidelines to meet Uniform Guidance requirements. The standards and responsibilities are addressed in the Department of Financial Service's Grants Administration Manual. This Program Manual supplements and does not supersede the Grants Administration Manual.

## 1.9 CITY'S AWARD

The City of Gainesville has been awarded \$32,408,804.00. The first tranche of funds was received on June 14, 2021, and the second tranche was received on June 16, 2022.

## 2 RECIPIENT RESPONSIBILITIES

### 2.1 INTERIM AND FINAL RULE

In May 2021, Treasury published the interim final rule describing eligible and ineligible uses of SLFRF, as well as other program requirements. The initial versions of the Compliance and Reporting guidance reflected the interim final rule and its eligible use categories. On January 6, 2022, the Treasury adopted the final rule implementing the SLFRF program. The final rule became effective on April 1, 2022.

Prior to the final rule effective date, the interim final rule remained in effect; funds used consistently with the interim final rule while it was in effect were in compliance with the SLFRF program. However, recipients could choose to take advantage of the final rule's flexibilities and simplifications ahead of the effective date. Recipients may consult the Statement Regarding Compliance with the Coronavirus State and Local Fiscal Recovery Funds Interim Final Rule and Final Rule for more information on compliance with the interim final rule and the final rule.

### 2.2 REPORTING REQUIREMENTS

Recipients are required to comply with Treasury's Compliance and Reporting Guidance and meet compliance and reporting responsibilities defined in the Final Rule, which includes submitting mandatory periodic reports to Treasury. Recipients' reporting requirements vary by the type and amount of funds received.

The City of Gainesville reporting requirements fall under Tier 2: Metropolitan cities and counties with a population below 250,000 residents which received more than \$10 million in SLFRF funding. The following reports are required:

1. Interim Report due August 31, 2021.
2. Quarterly Project and Expenditure Reports due by January 31, 2022, and then 30 days after the end of each quarter thereafter through April 30, 2027. The following table provides all reporting due dates under this program.

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
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	April 30, 2027

To support the City in complying with the final rule, the Treasury has issued compliance and reporting guidance that reflects the final rule and provides additional detail and clarification for compliance and reporting

responsibilities under the SLFRF program. These guiding documents are to be read in concert with the Award Terms and Conditions, the authorizing statute, the final rule, and other regulatory and statutory requirements, including regulatory requirements under the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance” or 2 CFR Part 200), and the Compliance Supplement.

## 2.3 REPORTING DEFINITIONS

The City is required to report obligations and expenditures by project according to the corresponding Expenditure Category. As noted in the Reporting Guidance, there is a wide range of eligible uses of the SLFRF funds, and Treasury must be able to track how funds are used by the City for oversight and transparency purposes. Definitions for key reporting terms include:

- An obligation is an order placed for property and services, contracts and subawards made, and similar transactions that require payment.
- An expenditure is the amount that has been incurred as a liability of the entity (the service has been rendered or the good has been delivered to the entity).
- The adopted budget is the budget adopted for each project associated with SLFRF funds. The City will provide to the Treasury the Adopted Budget based on information that exists currently in the City’s financial systems.

The City is responsible for establish controls to ensure completion and timely submission of all mandatory performance and/or compliance reporting.

In addition, the Treasury issues and frequently updates the Compliance and Reporting Guidance, which governs reporting requirements for this award. The current guidance can be found on the Treasury SLFRF webpage: <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/state-and-local-fiscal-recovery-funds>.

## 2.4 TREASURY PORTAL

All required reports must be submitted via the Treasury Portal by the City.

Portal access was provided by Treasury when the City first applied for ARPA funding and is assigned to one City employee. The Treasury Portal is managed by the City’s ARPA program manager.

Prior to submitting reports, the ARPA program manager will compile and send draft reports for review and feedback to the following staff:

- City Manager and other staff as designated by the City Manager
- Finance Director and other staff as designated as designated by the Finance Director
- ARPA external consultant

The City Manager must approve all reports prior to submission via the portal by the ARPA Program Manager.

## 2.5 REPORTING DATA

The following information is required in Project and Expenditure Reports for both quarterly and annual reporting:

- Projects: provide information on all SLFRF funded projects including project name, identification number (created by the recipient), project expenditure category, description, and status of completion. Project descriptions must describe the project in sufficient detail to provide an understanding of the major activities that will occur, and must be between 50 and 250 words. For each project, the recipient is asked to select the appropriate Expenditure Category based on the scope of the project. Projects should be



scoped to align to a single Expenditure Category. For select Expenditure Categories, the recipient also is asked to provide additional programmatic data as described in the current Compliance and Reporting Guidance.

- Obligations and Expenditures: Project details will include the current period obligation, cumulative obligation, current period expenditure, and cumulative expenditure.
- Project status: selection from four categories: not started, completed less than 50 percent, completed 50 percent or more, completed.
- Program income: the City should report the program income earned and expended to cover eligible project costs, if applicable.
- Adopted budget for each project.
- Project demographic distribution for Public Health and Negative Economic Impact Expenditure Categories (beginning April 2022).
- For each project any subawards, contracts, grants, loans, transfers, and direct payments.
- Certification of Civil Rights compliance annually.

Expenditure Categories and other reporting requirements are frequently updated by the Treasury. Staff must continuously refer to the Treasury for up to Compliance and Reporting Guidance: <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/state-and-local-fiscal-recovery-funds>.

## 2.6 MONITORING AND COMPLIANCE

It is the City's responsibility to ensure all SLFRF award funds are used in compliance with the program's requirements. In addition, the City should be mindful of any additional compliance obligations that may apply – for example, additional restrictions imposed upon other sources of funds used in conjunction with SLFRF award funds, or statutes and regulations that may independently apply to water, broadband, and sewer infrastructure projects. The City should ensure it maintains proper documentation supporting determinations of costs and applicable compliance requirements, and how they have been satisfied as part of the award management, internal controls, and subrecipient oversight and management.

Treasury's final rule details recipients' compliance responsibilities and provides additional information on eligible and restricted uses of SLFRF award funds and reporting requirements. The City must comply with the information contained in Treasury's final rule when building appropriate controls for SLFRF award funds.

The City will maintain audit ready packages including proof of payment, procurement documentation if applicable, and general ledger references.

## 2.7 RECORD RETENTION REQUIREMENTS

Per the Treasury's Compliance and Report Guidance, the City must maintain records and financial documents for five years after all funds have been expended or returned to Treasury, as outlined in paragraph 4.c. of the Award Terms and Conditions. Treasury may request transfer of records of long-term value at the end of such period. Wherever practicable, such records should be collected, transmitted, and stored in open and machine-readable formats. The City must provide or make available such records to Treasury upon request, and to the Government Accountability Office ("GAO"), Treasury's Office of Inspector General ("OIG"), and their authorized representative in order to conduct audits or other investigations.

## 2.8 SINGLE AUDIT REQUIREMENTS

Recipients and subrecipients that expend more than \$750,000 in Federal awards during their fiscal year will be subject to an audit under the Single Audit Act and its implementing regulation at 2 CFR Part 200, Subpart F regarding audit requirements.



The City will be required to complete a single audit based on this award.

## **2.9 ARPA CONSULTANT**

On January 20, 2022 (Agenda # 210822), the City Commission awarded the Consulting Services for Oversight and Compliance for American Rescue Plan Act of 2021 (ARPA) and Other Grant Funds Request for Qualifications to Government Services Group, Inc. ("GSG"). The contract with GSG went into effect on February 26, 2022.

## 3 CONTRACTS

### 3.1 DEFINITIONS

The Uniform Guidance (effective December 26, 2014) implemented new definitions of Contractor and Subrecipient. With the Coronavirus Relief Funds and ARPA State and Local Fiscal Recovery Funds, the need to distinguish between the definitions and roles of subrecipient, contractor, and beneficiary has become evident. *Generally, determination of the relationship with an external entity is verified through review of the proposal, budget, and other related documents.* When the relationship remains unclear, this form can be used to provide assistance in making an accurate determination and provide documentation of the decision made.

- Subrecipient (2 CFR Part 200.1): Subrecipient means 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 program; but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a federal awarding agency. (The State of Florida uses 5XXXXX account code for payments to subrecipients).
- Beneficiary: A beneficiary is traditionally an individual who is the end user of the assistance (the individual needing the benefit). (Examples include recipients of scholarships, Medicaid claims/medical benefits, or housing/food assistance.) With CRF and ARPA SLFRF grants--businesses, non-profits, and educational institutions may also be beneficiaries of assistance. The SLFRF Compliance and Reporting Guidance indicates that “*subrecipients do not include individuals and organizations that received SLFRF funds as end users to respond to the negative economic impacts of COVID-19 on these organizations*”. The organizations would be beneficiaries in this case. The Single Audit Act and 2 CFR Part 200, Subpart F regarding audit requirements do not apply to beneficiaries. (The State of Florida uses 5XXXXX account code for payments to beneficiaries)
- Contractor (2 CFR Part 200.1): Contractor means an entity that receives a contract as defined. Contract means 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. For additional information on subrecipient and contractor determinations, see 2 CFR 200.331.

### 3.2 SUBRECIPIENT AGREEMENTS

The City is accountable to Treasury for oversight of its subrecipients in accordance with 2 CFR 200.332, including ensuring its subrecipients comply with the SLFRF statute, SLFRF Award Terms and Conditions, Treasury's interim final rule and final rule, applicable federal statutes, regulations, and reporting requirements. Subrecipients do not include individuals and organizations that received SLFRF funds as end users. Such individuals and organizations are beneficiaries and not subject to audit pursuant to the Single Audit Act and 2 CFR Part 200, Subpart F.

All subrecipient agreements will be individualized for each organization as the services provided may vary in expenditure code and therefore reporting requirements as required by the U.S. Treasury.

All subrecipient agreements will meet the following requirements: review by the ARPA external consultant, ARPA Program Manager, and will be processed and executed pursuant to the City's contract management policy and procedures.

### 3.3 PROCUREMENT OF GOODS AND SERVICES

The City will follow Federal Procurement requirements for federal awards and the City's procurement policies for contracts not deemed to be subrecipient agreements.

## 4 DISTRIBUTION OF ARPA FUNDS

### 4.1 FUND DISTRIBUTION

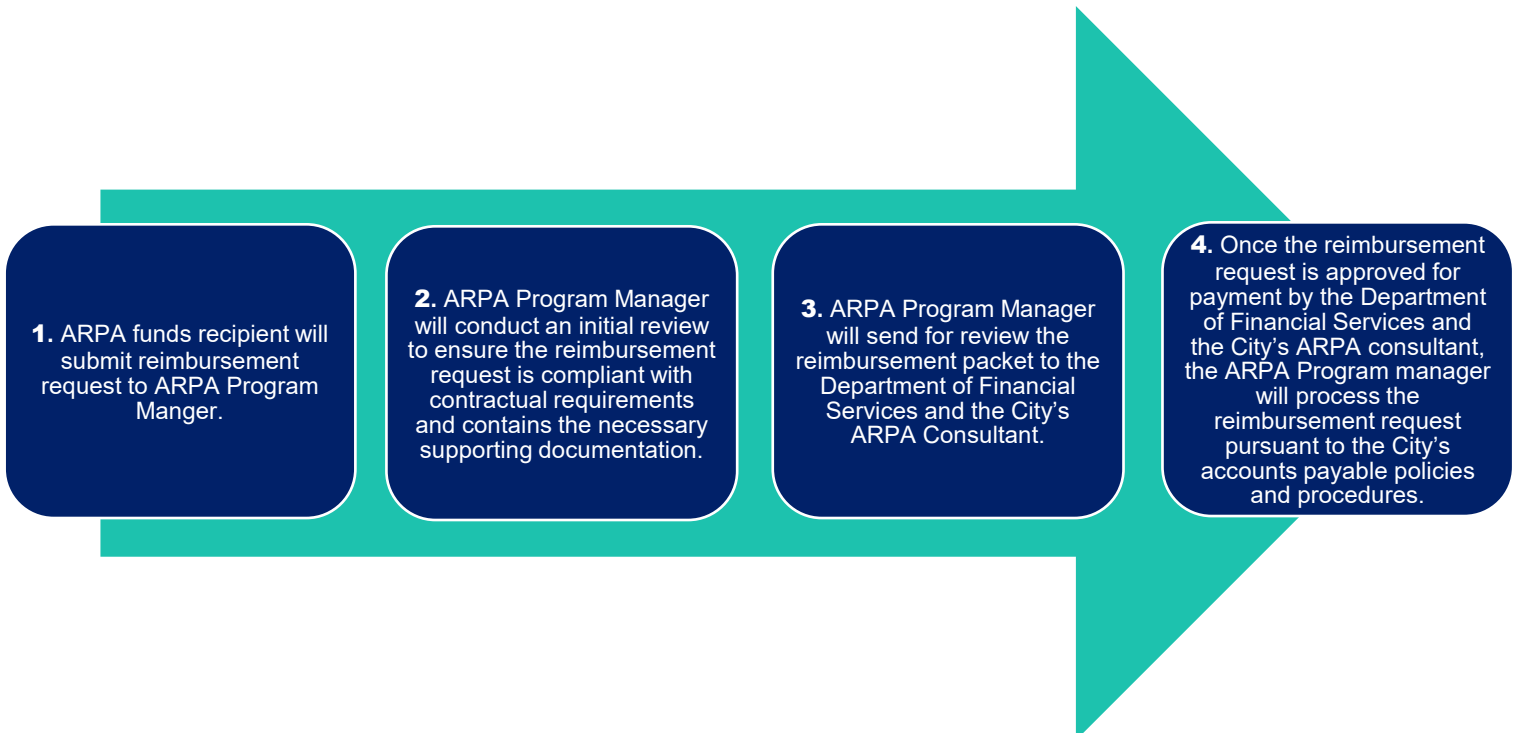
The City's ARPA funds will be disbursed via reimbursement only.

### 4.2 ENCUMBRANCE OF FUNDS

All subrecipient agreements and contracts will be encumbered via purchase order. Once an encumbrance is established via purchase order, this is considered an obligation of funds as defined in Section 2.3 – Reporting Definitions.

### 4.3 REIMBURSEMENT PROCESS

Review of reimbursement requests for subrecipient agreements is illustrated in the following graph:



### 4.4 OTHER FORMS OF FUND DISBURSEMENT

Other projects that require a direct payment (after services have been delivered or goods received) will be reviewed by the ARPA Consultant, ARPA Program Manager and will be processed by the Department of Financial Services. Examples of these types of projects are the Utility Debt Forgiveness Program and Energy Rehabilitation.

## 5 PROJECT MANAGEMENT

### 5.1 SCOPE DEVELOPMENT AND REVIEW

All SLFRF projects must meet ARPA eligibility requirements. GSG will provide a review and recommendation for ARPA eligibility. Staff will provide recommendation to the City Commission.

The City will provide information on all SLFRF funded projects as required in Section 2 – Reporting Requirements. The City should review the Required Programmatic Data described in this section and define their projects at a sufficient level of granularity.

In addition, the City will develop project summaries to include:

- Description of the project
- Budget
- Timeline for implementation
- ARPA expenditure category
- City strategic goal
- Justification
- Information on target population
- Goals and objectives
- Project lead
- Resources and support needed
- City departments and external partners needed for implementation

### 5.2 CITY COMMISSION APPROVAL

All SLFRF projects and budgets must be approved by the City Commission at a publicly noticed meeting.

### 5.3 INITIAL PROJECT BUDGET APPROPRIATION

Before funds are spent by project managers, SLFRF funds must first be appropriated per the City's budget appropriation policy.

### 5.4 PROJECT BUDGET AMENDMENTS

All project budget adjustments will be presented to the City Commission for approval. If approved, the adjustments will be made per the City's budget amendment policy.

### 5.5 PROJECT MANAGEMENT AND PROGRESS

Project management will be key to implementing the City's ARPA program. In order to ensure proper oversight of this program, the City has established the following:

- ARPA Program Manager will provide an update on the ARPA Program implementation to the City Commission at least quarterly.
- ARPA Action Committee comprised of senior leadership to monitor the ARPA Program progress. The ARPA Action Committee will meet at least quarterly to discuss project and funding status, progress and will make recommendations to the City Commission on projects as needed. The ARPA Action Committee will also resolve issues with subrecipients and will provide oversight to the ARPA Program administrator. The ARPA Action Committee will meet at least quarterly through the duration of the ARPA program.
- Citywide Project Managers Team comprised of all ARPA project managers citywide. The Project Managers Team will meet at least quarterly with the ARPA Program manager to discuss overall project updates.

- Project Teams comprised of an individual project's implementation team and project manager. The Individual Project Teams will meet at least monthly with the ARPA program manager and will review project budget, status, procurement, project expenditures and financial reporting for the project.
- Lead Project Managers will be designated as established in the City's Grants Administration Manual.

## 5.6 PROJECT COMPLETION

As projects are completed, the ARPA Program Manager will inform to the ARPA Action Committee on any balances remaining.

- If there are balances remaining, the ARPA Action Committee will develop a spend plan recommendation for presentation to the City Commission at the next scheduled quarterly update for their approval.
- If there are no balances remaining, the ARPA Program Manager will formerly close the project and file the necessary reports with Treasury and pursuant to other City policies and procedures. In addition, a final report will be provided to the City Commission at the next scheduled quarterly update.

## 5.7 FUNDING RE-ALLOCATION

As the ARPA projects progress, there may be instances where projects are completed under or over budget. In these scenarios, the following analysis and decision-making process will guide the recommendations made to City Commission on the revised project budgets:

Internally administered projects:

1. ARPA Program Manager and Project Team will determine the budget to actual projections of the project.
2. The Project Team will request changes to the ARPA Project Manager.
3. The ARPA Program Manager will compile project and budget information for presentation to the ARPA Action Committee.
4. The ARPA Action Committee will review the request.
5. The ARPA Action Committee will draft a recommendation for presentation to the City Commission.
6. At the next quarterly update, the APRA Program Manager will present the recommendation to the City Commission.
7. ARPA Program Manager will implement the City Commission directive.

Externally administered projects:

1. External Project Manager will submit the subrecipient expenditure plan amendment request to the ARPA Project Manager.
2. The ARPA Program Manager will compile project and budget information for presentation to the ARPA Action Committee.
3. The ARPA Action Committee will review the request and will make a determination on denial or approval.
4. ARPA Program Manager will communicate the ARPA Action Committee direction to the External Project Manager.
5. In the event funding for the project changes, the ARPA Action Committee will develop the recommendations for presentation to the City Commission.
6. At the next quarterly update, the APRA Program Manager will present the recommendation to the City Commission.
7. ARPA Program Manager will implement the City Commission directive.

## 6 PROGRAM MANUAL REVISIONS

A review and/or revisions to the ARPA Program Manual shall be recorded in the following format and communicated by the ARPA Program Manager, as necessary.

Version	Revision Date	Description
1.0	02/24/2023	Initial Release of ARPA Program Manual
2.0	04/18/2023	Addition of Funding Re-allocation process for projects.