

COVID-19 Financial Response

Technical Assistance:

SLFRF – Interim Report

August 11, 2021

Agenda

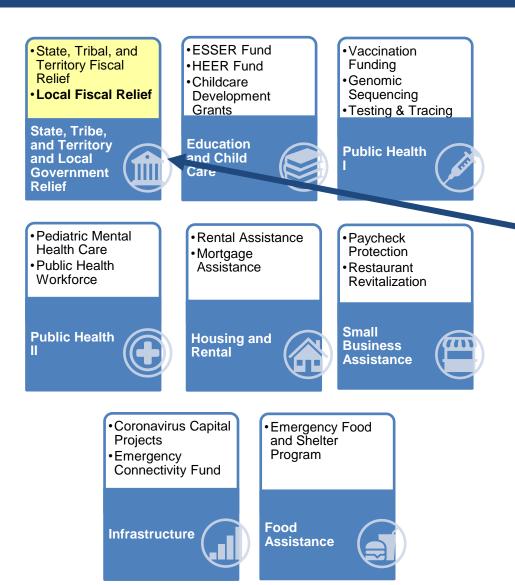
- 1. Introductions
- 2. ARPA Background
- 3. Overall Reporting Requirements
- 4. Interim Report

Required Reporting

All Cook County municipalities fall into 3 recipient categories and are required to submit the following

reports: **Recovery Plan Project and Interim Report Performance Report Expenditure Report** ("Recovery Plan") Large Counties/Cities Only Cook County + Quarterly City of Chicago **Metro Cities** <250k population + Quarterly >\$5m in FRF funds **NEUs Annually** October 31, 2021 August 31, 2021 August 31, 2021

ARPA Background



- On March 11, 2021, President Joe Biden signed into law the \$1.9 trillion American Rescue Plan Act (ARPA) package
- The ARPA package includes \$362 billion in direct federal fiscal recovery aid for state and local governments through the State & Local Fiscal Recovery Fund (SLFRF)
- Outside of the SLFRF, ARPA also provides billions to education, public health, housing, small business, infrastructure, and food assistance (graphic is not an exhaustive list of programs)
 - Local governments may be able to apply for grants to access other ARPA-funded programs

SLFRF Overview – Eligible Uses



Support Public Health Response

- COVID-19 Mitigation & Containment: vaccination programs, ventilation improvements in congregate or health care settings, contract tracing
- Medical Expenses: care and services to address near-and longer-term needs
- Behavioral Healthcare: mental health treatment, crisis intervention, substance misuse treatment
- Public Health & Safety Staff: payroll & benefits



Replace Public Sector Revenue Loss

Use funds to provide government services to the extent of the reduction in revenue experienced due to the pandemic

Lost revenues may be used to support general government services and infrastructure



Address Negative Economic Impacts

- Workers & Families: assistance to unemployed workers, job training, food, housing, survivor's benefits
- > Small Business: loans, grants, in-kind and technical assistance
- Public Sector: rehire staff, replenish state unemployment insurance, economic relief programs
- Impacted Industries: tourism, travel and hospitality, and other affected sectors



Water and Sewer Infrastructure

Make necessary investment to improve access to clean drinking water and invest in wastewater and stormwater infrastructure

Eligible uses aligned to EPA project categories in:

- > Clean Water State Revolving Fund (CWSRF)
- Drinking Water State Revolving Fund (DWSRF)



Premium Pay for Essential Workers

Provide premium pay to eligible workers performing essential work or to provide grants to third party employers with eligible workers

- Essential Employees: janitors/sanitation, public health, social service & safety, childcare & educators, nursing home/hospital staff, government
- Essential Work: involving regular in-person interactions
- Other Provisions: including retroactive premium pay



Broadband Infrastructure

Make necessary investment to provide unserved or underserved locations with new or expanded broadband access

Fund projects that deliver reliable services –
 minimum 100 Mbps download/upload speed

SLFRF Overview – Ineligible Uses



Deposits to 'rainy day' funds or financial reserves

Contributions to rainy day funds and similar financial reserves would not meet pandemic response needs but would rather constitute savings for future spending needs



Legal settlements or judgements

Funds cannot be used on legal settlements or judgements except to the extent the judgment or settlement requires the provision of services that would respond to the public health emergency



Deposits into defined benefit pension funds

Funds cannot be used for deposits into defined benefit pension funds; however, funds may be used for routine payroll contributions to pensions of employees whose wages are an eligible use



General infrastructure spending

General infrastructure spending is not covered as an eligible use of funds outside of water, sewer, and broadband investments or above the amount allocated under the revenue loss provision



Debt service

Funds cannot be used to pay debt service for any obligation incurred prior to March 3, 2021



Non-Federal match for Federal programs

May not be used as non-Federal match for other programs whose statute or regulation bar the use of Federal funds to meet matching requirements

Reporting Requirements

Reporting Overview

Counties, metro cities, and municipalities may be required to submit up to 3 separate report types

1

Interim Report

- First Report Due: August 31, 2021
- Reporting Frequency: One-time
- 1st Period Covered: March 3 July 31, 2021
- Expenditures and obligations by Expenditure Category at the summary level, not project level

2

Recovery Plan Performance Report ("Recovery Plan")

- First Report Due: August 31, 2021
- Reporting Frequency: Annually
- 1st Period Covered: March 3 July 31, 2021
- RPPs will cover a 12-month period (July June). The County will be required to submit the report to Treasury and post the report on its public-facing website within 30 days after each 12-month period
- Key performance indicators identified by the recipient and some mandatory indicators identified by Treasury

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Project and Expenditure Report

- First Report Due: October 31, 2021
- Reporting Frequency: Annually (NEUs);
 Quarterly (Metro Cities)
- 1st Period Covered: March 3 September 30, 2021
- Subsequent reports due within 30 days after the end of each calendar quarter
- Report on projects funded, expenditures, contracts, and subawards over \$50,000
- Same general data as the reports submitted for CRF, with some modifications to classifications and additions of data elements related to eligible uses

Required Reporting

All Cook County municipalities fall into 3 recipient categories and are required to submit the following

reports: **Recovery Plan Project and Interim Report Performance Report Expenditure Report** ("Recovery Plan") Large Counties/Cities Only Cook County + Quarterly City of Chicago **Metro Cities** <250k population + Quarterly >\$5m in FRF funds **NEUs Annually** October 31, 2021 August 31, 2021 August 31, 2021

Reporting Concepts

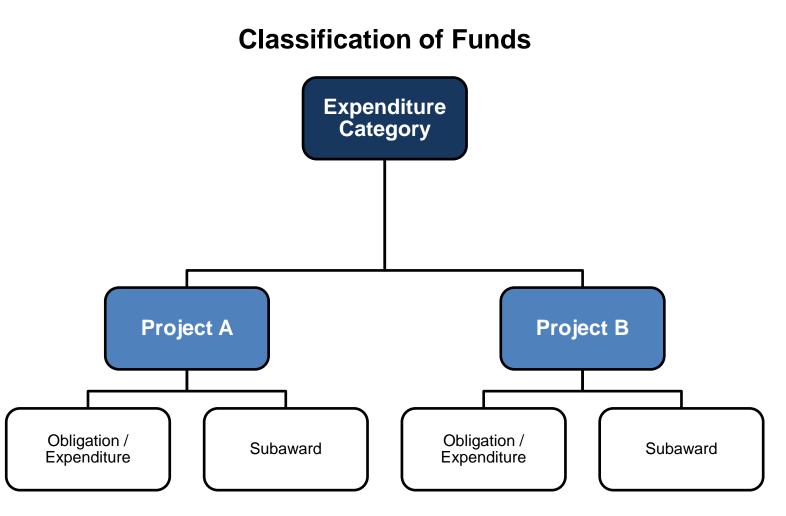
Reporting required at the Expenditure Category and/or Project Level, depending on the report.

Expenditure Category

- Coding system to track how funding is used and identify where additional programmatic data is required
- 66 total subcategories within 7 larger categories

Project Level

- Multiple projects within an Expenditure Category
- Each project may only be aligned to a single Expenditure Category
- Projects should be defined to include only closely related activities directed toward a common purpose



Reporting Tips

Some tips to ensure that you meet the reporting requirements:

- 1. Develop and implement internal controls to ensure that funding decisions constitute eligible uses of funds and document determinations.
- 2. Develop an approach to track expenditure activity. Questions to consider:
 - How are expenditures tracked by category and by project? What system is used?
 - How are direct costs (ex: contract support, materials, and supplies for a project) and indirect costs (ex: overhead, facilities, or administrative functional costs) tracked?
 - Are reports easily run for projects or subawards which provides necessary reporting details?
 - How are performance reporting metrics that are required captured?
- 3. Determine a subrecipient monitoring process.
 - 1. Federal funding guidelines require management and monitoring of subrecipients to ensure compliance.
- 4. Maintain all financial records.
 - Financial records and supporting documents related to the award must be retained for 5 years after all funds have been expended or returned to Treasury, whichever is later

Internal Controls

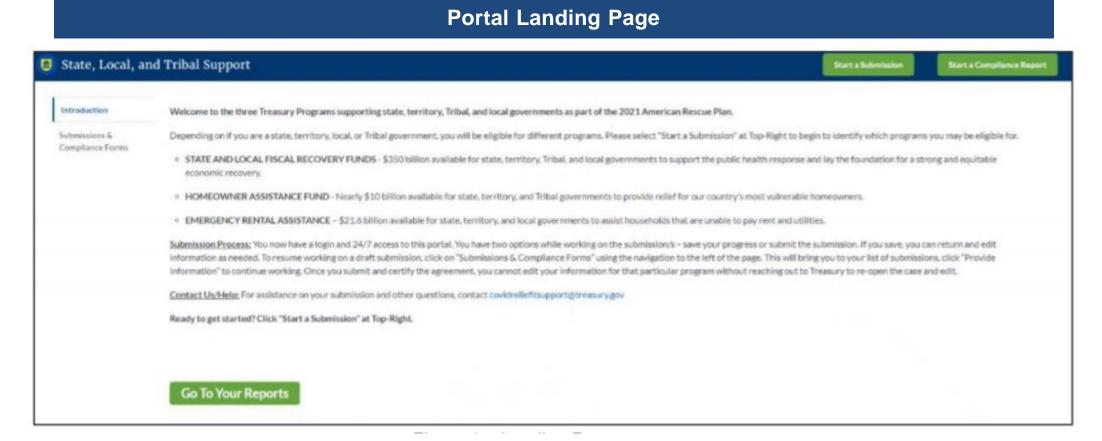
Internal Controls Best Practices:

Best Practice	Description	Example
1. Written policies and procedures	Formal documentation of recipient policies and procedures	Documented procedure for determining worker eligibility for premium pay
2. Written standards of conduct	Formal statement of mission, values, principles, and professional standards	Documented code of conduct / ethics for subcontractors
3. Risk-based due diligence	Pre-payment validations conducted according to an assessed level of risk	Enhanced eligibility review of subrecipient with imperfect performance history
4. Risk-based compliance monitoring	Ongoing validations conducted according to an assessed level of risk	Higher degree of monitoring for projects that have a higher risk of fraud, given program characteristics
5. Record maintenance and retention	Creation and storage of financial and non-financial records	Storage of all subrecipient payment information

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Interim Report – Overview

- U.S. Treasury released the <u>recipient reporting User Guide</u> on August 9th, 2021
- The User Guide is a supplement to the <u>Compliance and Reporting Guidance</u>
- The User Guide contains detailed instructions for navigating the Treasury's portal to submit the Interim Report
- The following slides provide an overview of the User Guide for the Interim Report



Interim Report – Recipient Information

- 1 Review and confirm your Recipient Profile pre-populated from your SLFRF Application file
- 2 Update Recipient DUNS (+4) number, if necessary
- Verify the names and contact information for individuals the recipient has designated for key roles for the SLFRF program displayed on the screen
- Use the textbox to flag errors, notifying Treasury if any information incorrect (including if account users are inaccurate)

Recipient Information Entry Screen



Text box to flag errors

4	Please report discrepancies (if any) on the above information	
	Show Point of Contact List	
•	Sinve D ₂	st.

Interim Report - Expenditure Category Reporting

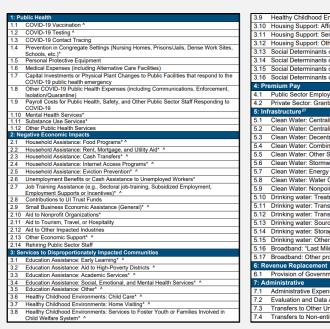
One-time report providing initial uses of funding between March 3 – July 31, 2021.

- Report must provide a breakdown of obligations & expenditures by each of the 66 Expenditure Categories
- Report appears similar to the CARES Act Coronavirus Relief Fund

Example:

ID	Expenditure Category	Cumulative Obligations	Cumulative Expenditures
2	Negative Economic Impacts		
2.1	Household Assistance: Food Programs	\$1,000,000	\$1,000,000
2.2	Household Assistance: Rent, Mortgage, and Utility Aid	\$2,000,000	\$500,000
2.3	Household Assistance: Cash Transfers	\$5,000,000	\$0

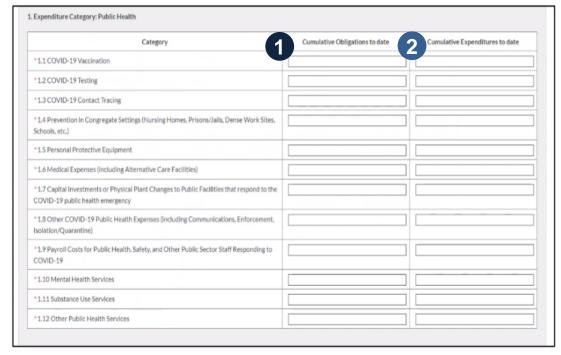
Expenditure Categories



3.9	Healthy Childhood Environments: Other* ^
	Housing Support: Affordable Housing* ^
	Housing Support: Services for Unhoused Persons* ^
	Housing Support: Other Housing Assistance* ^
3.13	Social Determinants of Health: Other* ^
	Social Determinants of Health: Community Health Workers or Benefits Navigators* ^
	Social Determinants of Health: Lead Remediation ^
3.16	Social Determinants of Health: Community Violence Interventions* ^
4: Pr	emium Pay
4.1	Public Sector Employees
4.2	Private Sector: Grants to Other Employers
5: Inf	rastructure ²⁷
5.1	Clean Water: Centralized Wastewater Treatment
5.2	Clean Water: Centralized Wastewater Collection and Conveyance
5.3	Clean Water: Decentralized Wastewater
5.4	Clean Water: Combined Sewer Overflows
5.5	Clean Water: Other Sewer Infrastructure
5.6	Clean Water: Stormwater
5.7	Clean Water: Energy Conservation
5.8	Clean Water: Water Conservation
5.9	Clean Water: Nonpoint Source
5.10	Drinking water: Treatment
5.11	Drinking water: Transmission & Distribution
5.12	Drinking water: Transmission & Distribution: Lead Remediation
5.13	Drinking water: Source
5.14	Drinking water: Storage
5.15	Drinking water: Other water infrastructure
5.16	Broadband: "Last Mile" projects
5.17	Broadband: Other projects
	venue Replacement
6.1	Provision of Government Services
7: Ac	Iministrative
7.1	Administrative Expenses
7.2	Evaluation and Data Analysis
7.3	Transfers to Other Units of Government
7.4	Transfers to Non-entitlement Units (States and territories only)

Interim Report - Expenditure Category Reporting

Expenditure Category Reporting Sample



7. Expenditure Category: Administrative and Other		
Category	Cumulative Obligations to date	Cumulative Expenditures to date
*7.1 Administrative Expenses		
*7.2 Evaluation and data analysis		
*7.3 Transfers to Other Units of Government	\$1.00	\$2.00
Cumulative Expenditure Category Totals:	Cumulative Amounts to Date, excluding NEU: Total Cumulative Obligations to Date \$1.00	and Non-UGLG transfers. Total Cumulative Expenditures to Date \$2.00

- 1 Enter 'Cumulative Obligations to Date' and 'Cumulative Expenditures to Date' for each expenditure category
- Leave expenditure categories that do not apply blank
- Review and verify the auto-calculated totals generated from the reporting fields.
 - 1. This represents the totals for *all* expenditure categories 1.1 through 7.3

For dollar amounts, enter whole numbers only and do not use dollar signs

Interim Report - Expenditure Category Reporting

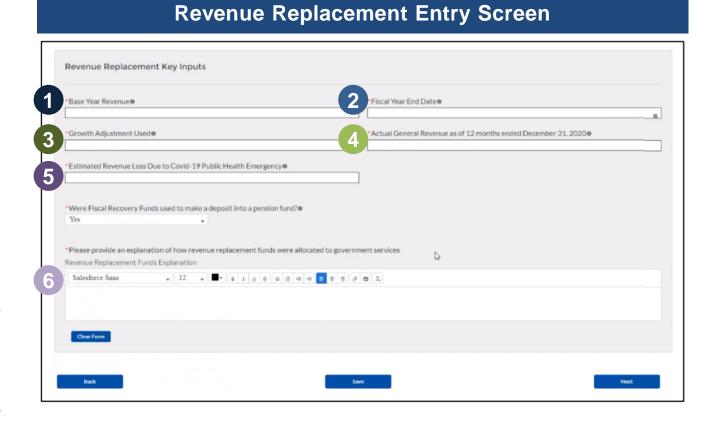
NOTE: You will see a "Recipient Allocation" section. This is only applicable to State and U.S. Territories, so **ignore this section and leave it blank**

7. Expenditure Category: Recipient Allocation		
Category	Cumulative Obligations to	lative Expenditures to date
*7.4 Transfers to Nonentitlement Units (NEU)	\$1.00	\$12.00
*7.5 Transfers to Non-UGLGs		
	Cumulative Amounts to Date, for N Total Cumulative Obligations to Date \$1.00	Total Cumulative Expenditures to Date \$12.00

Interim Report – Revenue Replacement

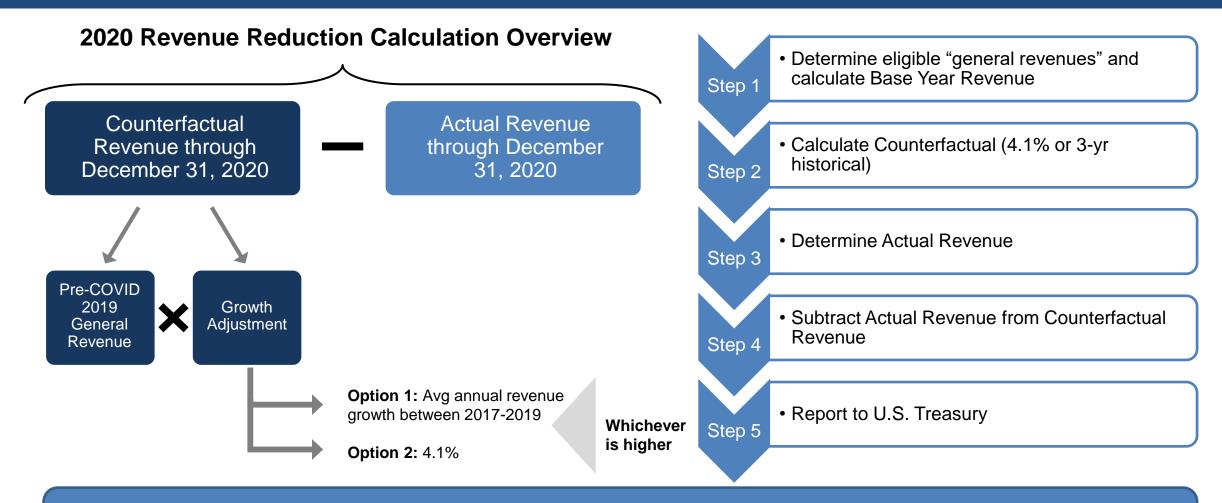
If Metro Cities plan to or already have expenditures in the Revenue Replacement category, they will be required to provide the following programmatic data:

- 1 Base year general revenue
- 2 Fiscal year end date
- Growth adjustment used (4.1% or 3-yr. historical growth rate)
- Actual general revenue as of the twelve months ended December 31, 2020
- Estimated revenue loss due to the Covid-19 public health emergency as of December 31, 2020
- An explanation of how revenue replacement funds were allocated to government services



For future calculation dates revenue loss will be reported only in the Quarter 4 reports due January 31, 2022, January 31, 2023, and January 31, 2024

Revenue Reduction Calculation



Losses are determined by calculating counterfactual revenue to estimate revenue growth absent the pandemic

Interim Report – Certification

- 1 ARR's Name, Title, Telephone Number, and E-Mail Address will be presented for review
- 2 Allow the Certifying Official to review all prior screens and entries to verify accuracy of entered information and data
 - The Authorized Representative for Reporting (ARR) will be asked to certify information pertaining to the Interim Report
 - By certifying this submission, the ARR is confirming that all reported information is accurate and approved for submission
 - Users who are not designated as an ARR will not be presented with these screens

I certify that the information provided is accurate and complete after reasonable inquiry of people, systems, and other information available to the SLFRF recipient. The undersigned acknowledges that any materially false, fictitious, fraudulent statement, or representation (or concealment or omission of a material fact) in this submission may be the subject of criminal prosecution under the False Statements Accountability Act of 1996, as amended, 18 USC 1001, and also may subject me and the SLFRF Recipient to civil penalties, damages, and administrative remedies for false claims or otherwise (including under 31 USC 3729 et seq.) The undersigned is an authorized representative of the SLFRF Recipient with authority to make the above certifications and representative for Reporting acknowledges in accordance with 31 CFR 35.4(c) that recipients shall provide to the Secretary periodic reports providing detailed accounting of the uses of funds, as applicable, all modifications to a State's or Territory's tax revenue sources, and such other information as the Secretary may require for the administration of this program. In addition to regular reporting requirements, the Secretary may request other additional information as may be necessary or appropriate, including as may be necessary to prevent evasions of the requirements of this program. False statements or claims made to the Secretary may result in criminal, civil, or administrative sanctions, including fines, imprisonment, civil damages and penalties, debarment from participating in Federal awards or contracts, and/or any other remedy available by law. Name: Telephone: Telephone:

Summary of Reported Information

Cumulative Amounts (Category Funding)	
Total Cumulative Obligations to Date: \$0.00	Total Cumulative Expenditures to Date: \$0.00
Cumulative Amounts (Recipient Allocation)	
Total Cumulative Obligations to Date: \$0.00	Total Cumulative Expenditures to Date: \$0.00
Total Amount of NEU Distributions (Bulk Upload)	
Total NEU Eligible Recipients to Date:	Total NEU Ineligible Recipients to Date: O
Total NEU Transactions to Date: 0	
Total Amount of Non-UGLG Distributions (Bulk Upload)	
Total Non-UGLG Recipients to Date:	Total Non-UGLG Transactions to Date:
Total Amount of NEU/Non-UGLG Distributions (Bulk Upload):	

Interim Report – FAQs

1. Question: We are an NEU – do we need to submit an Interim Report?

Answer: No. Only states, metro cities, and counties are required to submit an Interim Report

2. Question: We have not spent any ARPA funds between March 3 and July 31, 2021. Are we still required to submit an Interim Report?

Answer: Yes, you will still need to submit an Interim Report, which will show \$0 funds spent for each Expenditure Category

Upcoming Technical Assistance Webinars

• <u>SLFRF – Interim Report:</u> Deep dive into the Interim Report requirements for Cook County Metro Cities. The report is due to the Treasury by August 31st. NEUs, or Cook County municipalities with populations of less than 50,000, do NOT submit an Interim Report

Dates: August 11th from 10-11am

 <u>SLFRF – Calculating Revenue Replacement:</u> The webinar will explain the revenue loss calculation, which is one of the broad-use categories under SLFRF and share key considerations

Dates: August 12th from 10-11am

Open Office Hours: Open hour for anyone to come with questions

Dates: August 13th from 10-11am

August						
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

Resources

- U.S. Treasury State and Local Fiscal Recovery Fund Webpage
- U.S. Treasury State and Local Fiscal Recovery Fund FAQs
- U.S. Treasury Portal User Guide for Recipients
- U.S. Treasury Compliance & Reporting Guidance
- State of Illinois Non-Entitlement Unit Webpage
- Cook County ARPA Webpage

Questions?

You may submit any additional questions by scanning the QR code or using this link: https://forms.office.com/r/3wK94kCCfi

Or send us an email at: SuburbanCOVIDFundingQuestions@cookcountyil.gov

