

Auditing ARPA Funds

(State and Local Fiscal Recovery Funds)

2022 Annual Fall Auditors Conference

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Applicable Requirements

- >Activities Allowed or Unallowed
- ➤ Allowable Costs / Cost Principles
- ➤ Period of Performance
- ➤ Procurement Suspension & Debarment
- **≻**Reporting
- ➤ Subrecipient Monitoring



Activities Allowed or Unallowed

- ➤ Respond to the Public Health Emergency / Negative Economic Impacts
- ➤ Respond to workers performing essential work by providing premium pay
- ➤ Replace lost public sector Revenue
- ➤ Investing in water, sewer, and broadband infrastructure



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Allowable Costs / Cost Principle

- ▶2 CFR Part 200, Subpart E
 - General Provisions
 - Basic Considerations
 - Direct and Indirect Costs
 - Special Considerations
 - General Provisions for Selected Items of Cost



Period of Performance

- ➤ Costs incurred between:
 - March 3, 2021 December 31, 2024
- ➤ Disbursed by December 31, 2026



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Procurement

➤ Must follow the procurement standards in 2 CFR 200.318 through 200.327, including ensuring that the procurement method used for the contracts are appropriate based on the dollar amount and the conditions specified in 2 CFR 200.320 (Per compliance supplement)



Procurement

- ➤ Revenue Loss is exempt from Federal procurement standards but must follow:
 - State Statute: Public Purchases Law IC 5-22
 - Local Procurement Policy



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Suspension & Debarment

>2 CFR 200.214:

Non-Federal entities are subject to the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR part 180. The regulations in 2 CFR part 180 restrict awards, subawards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities.



Reporting

➤Interim Report:

- Provides initial overview of status and uses of funding.
- Includes expenditures through July 31, 2021, by category and at the summary level.
- This was a one-time report that was due August 31st of 2021.



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Reporting

➤ Project and Expenditure Report:

- Report on financial data, projects funded, expenditures, and contracts and subawards over \$50,000, and other information.
- The reporting frequency and deadlines vary by type of recipient and total allocation amount.



Reporting

- ➤ Recovery Plan Performance Report:
 - Provides information on the projects that large recipients are undertaking with program funding and how they plan to ensure program outcomes are achieved in an effective, efficient, and equitable manner.



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Subrecipient Monitoring

- ➤ Required for all entities that are deemed to be subrecipients.
- ➤ No monitoring required for those entities deemed to be beneficiaries



Internal Controls

- ▶2 CFR 200.303 requires a non-Federal entity:
 - To establish and maintain effective internal control over the Federal Award
 - Comply with federal statutes, regulations, and terms and conditions of federal award
 - Evaluate and monitor compliance with statutes regulations in terms of conditions
 - take prompt action when instances of noncompliance are identified
 - take reasonable measures to safeguard protected personally identifiable information



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Schedule of Expenditures and Federal Awards

- ➤ ARPA State and Local Fiscal Recovery Funds are an advance grant.
- ➤ Assistance Listing Number: 21.027
- ➤ Program Title: Coronavirus State and Local Fiscal Recovery Funds
- ➤ Direct Grant from Department of Treasury



Resources

- ➤ State Examiner Directive 2021-1
 - https://www.in.gov/sboa/files/Directive-2021-1-Accountingfor-ARP-and-Specific-Processes-for-Subtitle-M.pdf
- ➤SAM.gov
 - https://sam.gov/content/home



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Resources

- ➤ Code of Federal Regulations Title 2:
 - https://www.ecfr.gov/current/title-2
- ➤ Compliance Supplement SLFRF Technical Update:
 - https://www.cfo.gov/assets/files/21.027%20Tr
 easury%20SLFRF%20Technical%20Update%2
 0-%20Final%20%2004%2004%2022.pdf



Miscellaneous

- ➤ Assistance Listing: 21.032
- ➤ Program Title: Local Assistance and Tribal Consistency Fund
- ➤ Advance Grant
- https://home.treasury.gov/system/files/136/LATC F-guidance.pdf



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